

EXHIBIT A



McMANIMON • SCOTLAND • BAUMANN

75 Livingston Avenue, Roseland, NJ 07068 (973) 622-1800

April 9, 2025

Daryl Heller

Invoice #: 240544
Client #: 35240
Matter #: 1
Billing Attorney: SBP

INVOICE SUMMARY

For Professional Services Rendered Through February 28, 2025.

RE: Deerfield Capital, LLC - Bankruptcy Chapter 11

Total Professional Services	\$ 78,097.50
Total Disbursements	<u>\$ 2,327.53</u>
TOTAL THIS INVOICE	\$ 80,425.03



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PROFESSIONAL SERVICES

Date	Atty	Task	Description	Hours	Amount
2/10/25	AS1	CAS	Call with H. Sorvino and D. Heller re: status and removal issues, sale of house, buyer, higher/better offers, bank accounts	.70	507.50
2/10/25	JDS	CAS	Review draft of notice of removal	.40	120.00
2/10/25	JDS	CAS	Review client's file and draft Notice of Removal.	.90	270.00
2/10/25	JDS	CAS	Review Federal Bankr. Rule 9027, 28 U.S.C. §§ 1334 and 1452, and to D.N.J. LBR 9027-1 to determine where to file Notice of Removal. Detailing analysis and send to A. Sodono.	.40	120.00
2/10/25	SBP	CAS	Revise notice of removal of PA action to NJ	.20	105.00
2/10/25	SBP	CAS	Call with client re: first day information	.20	105.00
2/10/25	SBP	CAS	Revise letter to PA court re: stay	.10	52.50
2/10/25	SBP	CAS	Discuss debts with A. Sodono	.20	105.00
2/10/25	SBP	FEEAP	Review and revise MSB retention application	.20	105.00
2/10/25	SBP	CAS	Revise letter to Pennsylvania court re: filing	.10	52.50
2/10/25	SBP	CAS	Email with E. Pappas re: 5th amendment	.10	52.50
2/10/25	SBP	CAS	Review PA petition and order against judgment debtors	.40	210.00
2/11/25	AS1	FEEAP	Analyze and revise MS&B retention pleadings and discuss with Sari B. Placona	.40	290.00
2/11/25	AS1	CAS	Call with Daryl Heller re: strategy of motions	.60	435.00
2/11/25	AS1	CAS	Communicate with Sari B. Placona re: strategy and status	.30	217.50
2/11/25	AS1	CAS	Call with Daryl Heller and Heidi Sorvino re: assets, liabilities, claims	.60	435.00
2/11/25	AS1	CAS	Zoom call with client re: claim and charges	.90	652.50
2/11/25	AS1	LIT	Draft Notice of Removal	.30	217.50
2/11/25	AS1	LIT	Communicate with Gibbons re: state court status of actions	.30	217.50
2/11/25	AS1	LIT	Court hearing with Lancaster	.20	145.00
2/11/25	AS1	STAY	Analyze Deerfield stay relief motion and discuss with client	1.30	942.50
2/11/25	AS1	CAS	Post court call with Gibbons and D. Heller re: status	.40	290.00
2/11/25	BBC	CAS	Searched for UCCs in New Jersey and Pennsylvania; advised J. Stern and S. Placona of results.	.50	95.00
2/11/25	IDF	LIT	Begin drafting extent validity and priority complaint	.70	175.00
2/11/25	JZ	CAS	Reviewed emails with the broker re: request for an extension of the contract deadline.	.10	37.50
2/11/25	JZ	DISP	Began reviewing motion filed by Deerfield Capital and attachments for motion to be prepared to sell Sea Isle property.	.70	262.50
2/11/25	MK	CAS	Drafted Retention Application for MSB and Letter serving Application.	.50	95.00
2/11/25	SBP	CAS	Discuss removal process with A. Sodono	.20	105.00
2/11/25	SBP	CAS	Revise notice of removal of PA action	.10	52.50



Date	Atty	Task	Description	Hours	Amount
2/11/25	SBP	FEEAP	Revise MSB retention application	.20	105.00
2/11/25	SBP	CAS	Review client email re: assets	.10	52.50
2/11/25	SBP	CAS	Review A. Ciardi position emails	.20	105.00
2/11/25	SBP	CAS	Email broker re: status of sale contract	.10	52.50
2/11/25	SBP	CAS	Email with J. Voss re: stay of Prestige matter	.10	52.50
2/11/25	SBP	CAS	Email with B. Zemlock re: debtor's obligation in Prestige matter	.10	52.50
2/11/25	SBP	CAS	Communicate with E. Wilkins re: utilities on house for sale	.10	52.50
2/11/25	SBP	CAS	Call with E. Goldstein re: sale of Sea Isle property	.20	105.00
2/11/25	SBP	CAS	Review Deerfield letter to judge re: expedited hearing	.10	52.50
2/11/25	SBP	CAS	Call with client and A. Sodono re: follow up on Judge Brown	.20	105.00
2/11/25	SBP	CAS	Review Deerfield Capital stay relief motion	.30	157.50
2/11/25	SBP	CAS	Court call with Judge Brown and A. Sodono and A. Ciardi	.20	105.00
2/11/25	SBP	CAS	Call with client and A. Sodono re: Judge Brown	.20	105.00
2/11/25	SBP	CAS	Call with criminal counsel and A. Sodono re: 5th amendment	.90	472.50
2/11/25	SBP	CAS	Email with J. Sponder re: MSB retention	.10	52.50
2/11/25	SBP	CAS	Communicate with Judge Brown's chambers re: hearing	.10	52.50
2/11/25	SBP	CAS	Review sale documents for Sea Isle	.40	210.00
2/11/25	SBP	CAS	Email with H. Freese re: Prestige matter	.10	52.50
2/11/25	SBP	CAS	Review Needham Bank demand letter	.20	105.00
2/11/25	SLL	FEEAP	File and serve retention papers for MSB	.30	60.00
2/12/25	AS1	CAS	Review Sea Isle payoff and title information	.20	145.00
2/12/25	AS1	CAS	Communicate with counsel re: marital property rights	.20	145.00
2/12/25	AS1	CAS	Multiple calls and emails with client re: strategy and bankruptcy issues	.80	580.00
2/12/25	AS1	LIT	Review Orrstown complaint	.20	145.00
2/12/25	AS1	CAS	Zoom call with client re: Deerfield motion	.50	362.50
2/12/25	AS1	CAS	Analyze Deerfield letter to court and draft reply	.70	507.50
2/12/25	AS1	CAS	Call with D. Heller re: press release issues, draft release motion, strategy	.60	435.00
2/12/25	AS1	CAS	Several communications with A. Ciardi re: discovery issues	.80	580.00
2/12/25	AS1	CAS	Communicate with Orrstown, Gibbons, Pappas re: Orrstown loans	.20	145.00
2/12/25	IDF	LIT	Continue drafting complaint re: extent and validity of priority. Submitted to supervising atty for review.	1.40	350.00
2/12/25	JZ	DISP	Discussion with S. Placona re: sale motion and items needed to prepare the same.	.10	37.50
2/12/25	JZ	DISP	Reviewed the payoff from Fulton.	.10	37.50
2/12/25	JZ	DISP	Began preparation of sale motion.	.80	300.00
2/12/25	SBP	CAS	Email with client re: utilities and stay relief	.10	52.50



Date	Atty	Task	Description	Hours	Amount
2/12/25	SBP	CAS	Email A. Ciardi re: date of motion for stay relief	.10	52.50
2/12/25	SBP	CAS	Review Ciardi letter to court re: deposition	.10	52.50
2/12/25	SBP	CAS	Review Ciardi letter to court in response to Sodono letter	.10	52.50
2/12/25	SBP	CAS	Review payoff statements for Sea Isle property	.20	105.00
2/12/25	SBP	CAS	Call with A. Sodono and client and L. Gibbons re: PA action	.50	262.50
2/12/25	SBP	CAS	Call with client re: Ciardi motion for stay relief	.50	262.50
2/12/25	SBP	CAS	Review Orrstown documents	.20	105.00
2/12/25	SBP	CAS	Email with J. Voss re: Paramount suit	.10	52.50
2/12/25	SBP	CAS	Revise media statement	.20	105.00
2/12/25	SBP	CAS	Discuss summary judgment with A. Sodono	.20	105.00
2/12/25	SBP	CAS	Email with client re: PR statement	.10	52.50
2/13/25	AS1	CAS	Communicate with L. Gibbons re: state court litigation and orders	.20	145.00
2/13/25	AS1	DATA	Analyze and research venue issues and review case law	1.60	1,160.00
2/13/25	AS1	CAS	Call with client re: notice of depositions	.50	362.50
2/13/25	JDS	CAS	Review Motion for Stay Relief, etc., in order to draft opposition.	.80	240.00
2/13/25	JDS	CAS	Research Affiliate Venue Rule under 28 U.S.C. § 1408(2) and substantive consolidation and write email memo to A. Sodono with findings.	1.20	360.00
2/13/25	JDS	CAS	Draft Opposition and Certification in Support, to Deerfield Motion to Lift Automatic Stay, Cash Collateral and Transfer Venue.	1.90	570.00
2/13/25	JDS	CAS	Review research and caselaw on venue, when to transfer venue, write email-memo to A. Sodono with findings and cases.	.90	270.00
2/13/25	SBP	CAS	Review L. Gibbons email to A. Ciardi re: service of PA action	.10	52.50
2/13/25	SBP	CAS	Review H Freese email re: Paramount litigation	.10	52.50
2/13/25	SBP	CAS	Call with client and A. Sodono re: Deerfield deposition	.50	262.50
2/13/25	SBP	CAS	Email client re: monthly operating reports	.10	52.50
2/14/25	AS1	CAS	Call with counsel re: Fifth Amendment issues and depositions	.50	362.50
2/14/25	AS1	CAS	Call with Daryl Heller re: financial issues, documents. Ch. 11 issues and requirements	.40	290.00
2/14/25	IDF	LIT	Began drafting motion for summary judgment re: avoiding liens.	1.30	325.00
2/14/25	JZ	DISP	Worked on sale pleadings.	1.20	450.00
2/14/25	SBP	CAS	Email with E. Wilkins re: sale transaction of Sea Isle	.10	52.50
2/14/25	SBP	CAS	Call with client re: bank accounts	.10	52.50
2/14/25	SBP	DISP	Communicate with E. Goldstein re: extension of sale closing	.10	52.50
2/14/25	SBP	CAS	Review letter and subpoena from A. McCoy re: Brandt subpoena in Pennsylvania action	.20	105.00
2/14/25	SBP	CAS	Revise utility motion	.30	157.50
2/14/25	SBP	CAS	Revise bank account motion	.30	157.50



Date	Atty	Task	Description	Hours	Amount
2/14/25	SBP	CAS	Call with client, A Sodono and criminal counsel re: deposition	.60	315.00
2/14/25	SBP	LIT	Review and revise complaint to determine extent, validity and priority of liens	.70	367.50
2/16/25	IDF	LIT	Finish drafting motion for summary judgment against unsecured liens on property of the estate.	1.10	275.00
2/17/25	AS1	CAS	Analyze and revise utility motion; bank account motion; complaint re: extent, validity, and priority; motion for summary judgment and supporting pleadings	5.90	4,277.50
2/17/25	AS1	CAS	Multiple calls and emails re: strategy, discovery, and testimony	.80	580.00
2/17/25	AS1	CAS	Communicate with A. Ciardi re: discovery and settlement issues	.20	145.00
2/17/25	AS1	CAS	Communicate with client re: financials and documents requested	.50	362.50
2/17/25	AS1	CAS	Analyze, draft, and revise utility and bank account motions and other supporting pleadings	1.40	1,015.00
2/17/25	AS1	LIT	Work on complaint and summary judgment re: Deerfield and Orrstown liens claims/review case law re same	1.60	1,160.00
2/17/25	IDF	LIT	Finalized edits on draft motion and submitted to supervising atty for review.	.90	225.00
2/17/25	JZ	DISP	Drafted and sent emails to the broker for information for the sale motion.	.10	37.50
2/17/25	JZ	DISP	Reviewed emails from the Debtor and the broker re: information for the motion.	.10	37.50
2/17/25	JZ	DISP	Telephone conference with the broker re: additional information needed for the sale motion.	.10	37.50
2/17/25	JZ	DISP	Drafted and sent email to S. Placona and A. Sodono re: drafts of the pleadings and issues of note in connection with the sale of the Sea Isle property.	.10	37.50
2/17/25	JZ	DISP	Continued preparation of sale motion.	2.40	900.00
2/17/25	JZ	DISP	Preparation of addendum to sale agreement.	.90	337.50
2/17/25	JZ	DISP	Reviewed email to counsel for the buyers with the proposed addendum.	.10	37.50
2/17/25	SBP	CAS	Review Sea Isle deed	.10	52.50
2/17/25	SBP	CAS	Revise bank account motion	.10	52.50
2/17/25	SBP	CAS	Revise utility motion	.10	52.50
2/17/25	SBP	CAS	Call with client and A. Sodono re: Ciardi discovery requests	.90	472.50
2/17/25	SBP	CAS	Call with client and A. Sodono re: subpoenas	.80	420.00
2/17/25	SBP	CAS	Email with J. Sponder re: status of filing	.10	52.50
2/17/25	SBP	AAR	Review assignments of membership interest of Premier	.40	210.00
2/17/25	SBP	AAR	Review and revise addendum for sale of property	.20	105.00
2/17/25	SBP	CAS	Review deeds for Ethan home	.20	105.00
2/17/25	SBP	LIT	Revise motion for summary judgment in support of complaint vs. Deerfield and Orrstown	.70	367.50



Date	Atty	Task	Description	Hours	Amount
2/17/25	SBP	FEEAP	Review limited objection to MSB retention	.10	52.50
2/17/25	SBP	CAS	Revise statement in support of first day matters	.30	157.50
2/17/25	SBP	LIT	Revise complaint against Deerfield Capital and Orrstown Bank	.50	262.50
2/17/25	SBP	CAS	Review emails with A. Ciardi and A. Sodono re: receivership and entities	.10	52.50
2/18/25	AS1	CAS	Research Pennsylvania law and review case law of judgment liens Anthony Sodono, III to personal property assets	.80	580.00
2/18/25	AS1	CAS	Call with client re: status/strategy	.80	580.00
2/18/25	JDS	CAS	Research Pennsylvania state law on whether a judgment creditor automatically obtains a lien on personal property.	.30	90.00
2/18/25	JDS	CAS	Research New Jersey and Pennsylvania law on whether property is considered marital property even if only one spouse name in on the title.	1.20	360.00
2/18/25	JDS	CAS	Draft email memo on venue.	.10	30.00
2/18/25	JDS	CAS	Retrieve research for A. Sodono regarding venue and principal asset.	.10	30.00
2/18/25	JDS	CAS	Research 5th amendment jurisprudence in bankruptcy context and draft memo to A. Sodono.	.90	270.00
2/18/25	JZ	FEEAP	Began preparation of retention pleadings.	.80	300.00
2/18/25	JZ	DISP	Preparation of notice of proposed private sale.	.50	187.50
2/18/25	JZ	FEEAP	Drafted and sent email to S. Placona and A. Sodono re: certification of realtor for review.	.10	37.50
2/18/25	JZ	DISP	Preparation of certification of Randall Leaman.	1.20	450.00
2/18/25	JZ	FEEAP	Finalized draft of realtor certification and emailed to the realtor for review and execution.	.20	75.00
2/18/25	JZ	FEEAP	Continued preparation of retention pleadings.	1.10	412.50
2/18/25	JZ	FEEAP	Reviewed email from the realtor re: revisions needed to her certification.	.10	37.50
2/18/25	JZ	FEEAP	Revised the retention pleadings based upon the comments from the realtor.	.10	37.50
2/18/25	JZ	FEEAP	Drafted and sent email to the realtor re: revised certification for her review and execution.	.10	37.50
2/18/25	JZ	DISP	Worked on the memo of law re: sale of Sea Isle property.	.80	300.00
2/18/25	KR	CAS	Emails with Sari Placona regarding property records search	.20	38.00
2/18/25	KR	CAS	Perform property record search	.20	38.00
2/18/25	KR	CAS	Review property records search and email results to Sari Placona	.60	114.00
2/18/25	SBP	CAS	Call with client re: subpoena	.20	105.00
2/18/25	SBP	CAS	Review case law on equitable distribution of property	.20	105.00
2/18/25	SBP	CAS	Review motion to appoint chapter 11 trustee	.40	210.00
2/18/25	SBP	AAR	Revise certification of Leaman in support of sale	.20	105.00



Date	Atty	Task	Description	Hours	Amount
2/18/25	SBP	CAS	Email with D. Siedman re: chapter 11 trustee	.10	52.50
2/18/25	SBP	FEEAP	Revise Broker application	.10	52.50
2/18/25	SBP	AAR	Revise certification in support of sale	.20	105.00
2/18/25	SBP	FEEAP	Revise reply to Ciardi objection's to MSB retention	.20	105.00
2/18/25	SBP	AVOID	Revise motion for summary judgment re: complaint v Deerfield and Orrstown	.20	105.00
2/18/25	SBP	AVOID	Revise complaint v Deerfield and Orrstown	.20	105.00
2/18/25	SBP	AAR	Calm with E. Goldstein re: addendum to sale	.10	52.50
2/18/25	SBP	FEEAP	Call with J. Sponder and A. Sodono re: retention	.30	157.50
2/19/25	AS1	DISP	Analyze and review sale pleadings, documents, certifications, asset purchase agreement, and motion and discuss with Sari B. Placona and client	1.30	942.50
2/19/25	AS1	DISP	Revise Leaman certification	.30	217.50
2/19/25	AS1	DISP	Draft and amend Leaman certification and discuss with Joseph Zapata	.40	290.00
2/19/25	JDS	CAS	Review Deerfield Motion to Appoint Trustee, advise in email-memo whether law on assertion of 5th Amendment is correct.	.50	150.00
2/19/25	JDS	CAS	Draft Notice of Deposition and Schedule A for Document Production to Paul Miller of Deerfield Capital, LLC and Albert Ciardi, counsel to Deerfield Capital LLC regarding their Motions [ECF 9, 30].	.90	270.00
2/19/25	JDS	CAS	Retrieve cases on 5th amendment jurisprudence and upload to file.	.20	60.00
2/19/25	JDS	CAS	Revise Notice of Deposition and Schedule A for Document Production to Paul Miller of Deerfield Capital, LLC and Albert Ciardi, counsel to Deerfield Capital LLC regarding their Motions [ECF 9, 30].	.90	270.00
2/19/25	JZ	DISP	Reviewed comments to certification from S. Placona.	.10	37.50
2/19/25	JZ	DISP	Back and forth emails with S. Placona re: certification of the Debtor.	.10	37.50
2/19/25	JZ	FEEAP	Revised retention pleadings.	.10	37.50
2/19/25	JZ	FEEAP	Drafted and sent follow-up email to the broker re: retention certification.	.10	37.50
2/19/25	JZ	FEEAP	Drafted and sent email to the Debtor re: broker retention application.	.10	37.50
2/19/25	JZ	DISP	Drafted and sent email to S. Placona for information needed re: Leaman certification.	.10	37.50
2/19/25	JZ	FEEAP	Reviewed email from criminal counsel re: the retention application.	.10	37.50
2/19/25	JZ	FEEAP	Finalized and coordinated filing of broker retention pleadings.	.20	75.00
2/19/25	JZ	AVOID	Reviewed email from S. Placona to revise the complaint against Deerfield to include Superior Group ATMS LLC.	.10	37.50



Date	Atty	Task	Description	Hours	Amount
2/19/25	JZ	AVOID	Reviewed filed complaint against Deerfield and analyzed for purposes of filing amended complaint.	.20	75.00
2/19/25	JZ	DISP	Continued preparation of pleadings in support of sale of Sea Isle property.	1.20	450.00
2/19/25	SBP	CAS	Review Deerfield application for expedited hearing to appoint a trustee	.10	52.50
2/19/25	SBP	AVOID	Communicate with M. Weiss re: status of SJ motion	.10	52.50
2/19/25	SBP	CAS	Email with A. Ciardi re: deposition notices to Deerfield	.10	52.50
2/19/25	SBP	FEEAP	Email with H. Freeze re: broker retention	.10	52.50
2/19/25	SBP	CAS	Revise motion to authorize use of bank accounts	.20	105.00
2/19/25	SBP	AAR	Call with E. Goldstein re: sale of property	.10	52.50
2/19/25	SLL	FEEAP	Revise and file response to objection to MSB's retention	.20	40.00
2/20/25	JDS	CAS	Review file, documents, correspondences and loan documents and draft consent order for sale of property and certification concerning proposed consent order.	1.60	480.00
2/20/25	JDS	CAS	Revise draft consent order for sale of property and certification concerning proposed order.	.80	240.00
2/20/25	JZ	DISP	Reviewed email with copy of consent order vacating the SGA judgment.	.10	37.50
2/20/25	JZ	DISP	Revised and cleaned-up the certification of Randall Leaman, including restructuring the exhibits..	.90	337.50
2/20/25	JZ	DISP	Reviewed email from R. Leaman re: issue with percentages reflected in his Certification.	.10	37.50
2/20/25	JZ	DISP	Reviewed draft of alta.	.10	37.50
2/20/25	JZ	DISP	Reviewed redlined addendum extending time to close and addressing issue of higher and better.	.10	37.50
2/20/25	JZ	DISP	Reviewed email with corrective deed from R. Leaman.	.10	37.50
2/20/25	JZ	DISP	Continued preparation of the memorandum of law.	1.50	562.50
2/20/25	JZ	DISP	Reviewed emails from R. Leaman re: unwillingness to sign certification with lower percentages.	.10	37.50
2/20/25	JZ	DISP	Drafted and sent email to the broker re: filed retention application.	.10	37.50
2/20/25	JZ	DISP	Reviewed email to real estate counsel re: the corrective deed.	.10	37.50
2/20/25	JZ	FEEAP	Reviewed email from J. Sponder re: issue with retention certification.	.10	37.50
2/20/25	JZ	FEEAP	Preparation of amended certification.	.10	37.50
2/20/25	JZ	FEEAP	Drafted and sent email to E. Wilkins re: amended certification and request to confirm understanding re: no fees to defend fee app.	.10	37.50
2/20/25	SBP	CLAIM	Review Silverview Credit proof of claim	.10	52.50
2/20/25	SBP	CAS	Communicate with client re: UST requests	.20	105.00
2/20/25	SBP	CLAIM	Review claim of Parkview Advance	.10	52.50



Date	Atty	Task	Description	Hours	Amount
2/20/25	SBP	AAR	Review addendum to sale contract	.10	52.50
2/20/25	SBP	CAS	Review rule 2004 subpoena	.10	52.50
2/20/25	SBP	CAS	Revise letter to parties serving first day motions	.10	52.50
2/20/25	SBP	CAS	Call with A. Ciardi and A. Sodono re: trustee motion	.70	367.50
2/20/25	SBP	CAS	Call with client re: schedule information	.20	105.00
2/20/25	SBP	CAS	Review letter from A. Ciardi re: removal	.10	52.50
2/20/25	SBP	AAR	Review memorandum in support of sale motion	.30	157.50
2/20/25	SBP	AAR	Revise consent order to approve sale of property	.30	157.50
2/20/25	SBP	AAR	Call with E. Goldstein re: sale	.10	52.50
2/20/25	SBP	AVOID	Revise letter serving complaint	.10	52.50
2/20/25	SBP	AVOID	Revise deposition notice and schedule of documents to A. Ciardi and Deerfield	.20	105.00
2/20/25	SBP	CAS	Review client comments to motion to appoint trustee	.20	105.00
2/20/25	SBP	AAR	Call with client and A. Sodono re: assets and sale	1.20	630.00
2/20/25	SBP	AAR	Revise certification in support of sale	.10	52.50
2/20/25	SBP	CAS	Review Silverview Credit response to Deerfield motion for stay relief	.20	105.00
2/20/25	SLL	CAS	File and serve first day motions	.50	100.00
2/21/25	AS1	DISP	Analyze and review multiple emails re: Sea Isle sale and review sale pleadings	1.20	870.00
2/21/25	AS1	DISP	Discuss Sea Isle sale with Sari B. Placona	.20	145.00
2/21/25	AS1	CAS	Multiple communications with client and A. Ciardi re: examiner, production of documents, venue, motions, discovery	.70	507.50
2/21/25	AS1	CAS	Call with A. Ciardi re: examiner, trustee	.70	507.50
2/21/25	AS1	CAS	Communicate with Heidi Sorvino re: availability	.20	145.00
2/21/25	AS1	DISP	Communicate with client re: sale	.20	145.00
2/21/25	AS1	LIT	Call with Daryl Heller and L. Gibbons	.80	580.00
2/21/25	AS1	CAS	Communicate with Daryl Heller re: Grandviews	.30	217.50
2/21/25	AS1	CAS	Communicate with Daryl Heller re: strategy	.40	290.00
2/21/25	AS1	CAS	Communicate with Daryl Heller re: ventures	.30	217.50
2/21/25	AS1	CAS	Draft email to A. Ciardi re: inquiries and discuss with client	.40	290.00
2/21/25	AS1	DISP	Review contract addendum re: sale issues	.30	217.50
2/21/25	AS1	DISP	Multiple communications with Leaman re: certification and sale, ownership percentage	.30	217.50
2/21/25	AS1	CAS	Communicate with client re: strategy, organization chart, and issues	.60	435.00
2/21/25	AS1	CAS	Draft email to Kramer re: PTG	.20	145.00
2/21/25	JDS	CAS	Draft opposition to Deerfield Stay Motion.	2.20	660.00
2/21/25	JDS	CAS	Research doctrine of ripeness in order draft opposition to Deerfield Stay Motion.	.50	150.00



Date	Atty	Task	Description	Hours	Amount
2/21/25	JDS	CAS	Revise opposition to Deerfield Stay Motion.	1.70	510.00
2/21/25	JZ	FEEAP	Reviewed email and amended certification from the realtor.	.10	37.50
2/21/25	JZ	FEEAP	Coordinated filing of the amended certification.	.10	37.50
2/21/25	JZ	DISP	Reviewed back and forth emails with R. Leaman D. Heller re: the corrective deed.	.10	37.50
2/21/25	JZ	DISP	Revised Leaman certification to reflect change in percentages and other language with respect to the corrective deed.	.60	225.00
2/21/25	JZ	DISP	Drafted and sent email to S. Placona re: revised certification and issue with numbers in the Alta.	.10	37.50
2/21/25	JZ	DISP	Revised the memorandum of law, and other sale pleadings, to reflect information in revised certification, newly executed addendum, and bidding procedures.	2.20	825.00
2/21/25	JZ	DISP	Reviewed email and attached executed certification from R. Leaman.	.10	37.50
2/21/25	JZ	DISP	Revised the Leaman certification for filing.	.10	37.50
2/21/25	SBP	AAR	Email E. Goldstein re: status of addendum	.10	52.50
2/21/25	SBP	CAS	Email A. Ciardi re: status of PTG sale	.20	105.00
2/21/25	SBP	CAS	Call with client and S. Lipstein re: schedules	.20	105.00
2/21/25	SBP	CAS	Review and revise submission for notice of removal	.20	105.00
2/21/25	SBP	AAR	Revise certification of sale in support of sale of property	.20	105.00
2/21/25	SBP	CAS	Draft email to G. Kramer re: Chicago Atlantic sale	.20	105.00
2/21/25	SBP	CAS	Draft email to A. Ciardi re: Avail transaction to BlueWave	.10	52.50
2/21/25	SBP	CAS	Call with client and A. Sodono re: strategy	1.00	525.00
2/21/25	SBP	CAS	Call with H. Sorvino re: Avail Technologies	.20	105.00
2/22/25	SBP	CAS	Email H. Freese re: sale addendum	.10	52.50
2/22/25	SBP	CAS	Call With client re: missing schedule	.50	262.50
2/23/25	JDS	CAS	Retrieve caselaw on venue to send to U.S. Trustee's office.	.20	60.00
2/23/25	SBP	CAS	Call with H. Sorvino re: status of case	.40	210.00
2/23/25	SBP	LIT	Review email from J. Voss removal of Prestige lawsuit	.10	52.50
2/23/25	SBP	FEEAP	Review Asarco case for retention	.20	105.00
2/23/25	SBP	CAS	Communicate with A. Ciardi re: examiner	.10	52.50
2/23/25	SBP	CAS	Review emails re: schedules	.30	157.50
2/24/25	AS1	CAS	Review Miller CV and discuss with client	.30	217.50
2/24/25	AS1	CAS	Various communications with A. Ciardi re: various issues trustee, venue, lift-stay	.80	580.00
2/24/25	AS1	CAS	Communicate with client re: various issues trustee, venue, lift-stay	.30	217.50
2/24/25	AS1	DATA	Analyze UCC chart	.30	217.50



Date	Atty	Task	Description	Hours	Amount
2/24/25	AS1	DISP	Analyze and review sale documents including certifications, brief, application and order shortening time, contract for sale, listing agreement	3.60	2,610.00
2/24/25	AS1	CAS	Analyze and revise motion, certification, brief, payments, order	2.40	1,740.00
2/24/25	AS1	DISP	Call with client re: sale and percentage issues	.40	290.00
2/24/25	AS1	CAS	Review title and language	.20	145.00
2/24/25	AS1	CAS	Review Silverview joinder	.30	217.50
2/24/25	BBC	CAS	Reviewed email exchange re: UCC and Judgment Search request.	.10	19.00
2/24/25	BBC	CAS	Requested UCC and Judgment Search.	.30	57.00
2/24/25	BBC	CAS	Reviewed PA search judgment search results; forwarded same to team.	.30	57.00
2/24/25	JDS	CAS	Review client's comments and draft opposition to Deerfield Motion to Appoint Chapter 11 Trustee.	4.30	1,290.00
2/24/25	JDS	CAS	Research whether Affiliate Venue Rule codified in 28 U.S.C. § 1408(2) applies to business-debtors filing in same venue as individual debtor, send email memo to A. Sodono explaining caselaw and statutory analysis.	1.00	300.00
2/24/25	JDS	CAS	Research caselaw on whether an individual may be deemed an affiliate of a business-debtor, under the definition of 11 U.S. Code § 101(2)(A)(i)-(ii), and whether venue may be established under the Affiliate Venue Rule codified in 28 U.S.C. § 1408(2).	.90	270.00
2/24/25	JDS	CAS	Retrieve and review research on Affiliate Venue Rule and Substantive Consolidation and send to A. Sodono for review.	.30	90.00
2/24/25	JDS	CAS	Revise opposition to Deerfield Motion to Appoint Chapter 11 Trustee.	.70	210.00
2/24/25	JZ	DISP	Reviewed emails re: the latest addendum.	.10	37.50
2/24/25	JZ	DISP	Updated the exhibits for the sale motion.	.10	37.50
2/24/25	JZ	FEEAP	Addressed service questions re: the amended certification.	.10	37.50
2/24/25	SBP	CLAIM	Review Prosperum Capital claim	.10	52.50
2/24/25	SBP	AAR	Review signed addendum to sale contract	.10	52.50
2/24/25	SBP	CAS	Review client budget	.20	105.00
2/24/25	SBP	LIT	Discuss Prestige lawsuit	.20	105.00
2/24/25	SBP	CAS	Review Powercoin notices of foreclosure	.20	105.00
2/24/25	SBP	CAS	Review Austin Business suggestion of bankruptcy	.10	52.50
2/24/25	SBP	CAS	Call with A. Ciardi and A. Sodono re: trustee motion	.30	157.50
2/24/25	SBP	AAR	Email A. Ciardi re: transactional documents	.20	105.00
2/24/25	SBP	CAS	Call with client and A. Sodono re: status of trustee motion	.20	105.00
2/24/25	SBP	CAS	Call with client and S. Lipstein re: schedules	.20	105.00
2/24/25	SBP	CAS	Call with H. Freese re: schedules	.20	105.00
2/24/25	SBP	AAR	Review schedules	.80	420.00



Date	Atty	Task	Description	Hours	Amount
2/24/25	SBP	CAS	Call with client and A. Sodono re: schedules	.80	420.00
2/24/25	SBP	CAS	Review CV of G Miller as potential examiner	.20	105.00
2/24/25	SLL	CAS	Prepare and file schedules	5.00	1,000.00
2/25/25	AS1	CAS	Communicate with Sari B. Placona re: filing of corporate cases/impact on individual case	.40	290.00
2/25/25	AS1	CAS	Review case law re: substantive consolidataion issues	.70	507.50
2/25/25	AS1	CAS	Review Asardo case and issues	.40	290.00
2/25/25	BBC	CAS	Reviewed UCCs filed in the State of Pennsylvania.	.40	76.00
2/25/25	BBC	CAS	Prepared chart of filed UCCs; forwarded same to team.	.50	95.00
2/25/25	BBC	CAS	Reviewed judgment search results report.	.30	57.00
2/25/25	BBC	CAS	Prepared judgment chart re: Daryl Heller; forwarded same to team.	.30	57.00
2/25/25	JDS	CAS	Draft cease and desist letter.	.50	150.00
2/25/25	JZ	DISP	Addressed and made proposed revisions to the sale pleadings.	.80	300.00
2/25/25	JZ	DISP	Reviewed title report and preparation of email to the title agent re: proposed order for their review.	.20	75.00
2/25/25	JZ	DISP	Reviewed email from the title agent requesting addition language in the sale order.	.10	37.50
2/25/25	JZ	DISP	Drafted and sent email to the title agent re: proposed revised language.	.10	37.50
2/25/25	JZ	DISP	Continued revisions to the sale pleadings, including case law research.	3.50	1,312.50
2/25/25	MK	CAS	Analyzed and Organized files in Debtor's shared Portal according to the US Trustee's request for the Initial Debtor Interview.	.70	133.00
2/25/25	SBP	FEEAP	Email with J. Sponder re: broker retention application	.10	52.50
2/25/25	SBP	CAS	Review Steward Capital documents	.30	157.50
2/25/25	SBP	CAS	Email client re: 341a meeting	.10	52.50
2/25/25	SBP	CAS	Review NJ judgment search	.20	105.00
2/25/25	SBP	CAS	Call with client re: schedules	.10	52.50
2/25/25	SBP	CAS	Review judgment searches	.10	52.50
2/25/25	SBP	CAS	Review Silverview joinder to motion for trustee	.20	105.00
2/25/25	SBP	AAR	Revise sale motion	.40	210.00
2/26/25	AS1	CAS	Communicate with client re: amendments to petition, Schedules, and SOFA	.30	217.50
2/26/25	AS1	CAS	Analyze and review amendments to petition, schedules, and SOFA	.50	362.50
2/26/25	AS1	CAS	Communicate with L. Gibbons and Daryl Heller re: various discovery issues	.50	362.50
2/26/25	AS1	CAS	Call with Court re: status	.50	362.50
2/26/25	JZ	DISP	Sent revised certification to R. Leaman for signature.	.10	37.50



Date	Atty	Task	Description	Hours	Amount
2/26/25	JZ	DISP	Revised and finalized drafts of pleadings, including exhibits, for filing.	.50	187.50
2/26/25	JZ	DISP	Drafted and sent further email to R. Leaman re: need for him to sign and return certification.	.10	37.50
2/26/25	SBP	CAS	Review PA UCC searches	.20	105.00
2/26/25	SBP	CAS	Review emails re: schedule changes	.20	105.00
2/26/25	SBP	CAS	Communicate with E. Goldstein re: rental of property	.10	52.50
2/26/25	SBP	CLAIM	Communicate with G. Kramer re: claim deadline	.10	52.50
2/26/25	SBP	CAS	Call with court on status of resolving pending motions by Deerfield Capital	.50	262.50
2/26/25	SBP	FEEAP	Communicate with J. Sponder re: retention application	.10	52.50
2/26/25	SBP	CAS	Revise cease and desist letter to Barry	.10	52.50
2/26/25	SBP	CAS	Review emails from A. Ciardi re: schedules	.20	105.00
2/26/25	SBP	CAS	Call with H. Sorvino re: update with court	.10	52.50
2/26/25	SBP	CAS	Review Orrstown response to Deerfield chapter 11 trustee motion	.20	105.00
2/26/25	SBP	CAS	Review Orrstown response to Deerfield stay relief motion	.20	105.00
2/27/25	AS1	CAS	Analyze and revise examiner order	.60	435.00
2/27/25	AS1	CAS	Communicate with client re: examiner	.20	145.00
2/27/25	AS1	CAS	Communicate with Sari B. Placona re: Gallimore property	.20	145.00
2/27/25	AS1	CAS	Communicate with H. Freese re: examiner order	.30	217.50
2/27/25	AS1	CAS	Analyze US Trustee's comments to first-days bank account and utilities and discuss with Sari B. Placona	.50	362.50
2/27/25	SBP	CAS	Review Mitnick statement in response to trustee motion	.10	52.50
2/27/25	SBP	CAS	Review examiner order with Silverview comments	.20	105.00
2/27/25	SBP	CAS	Call with R. Parisi and C. Mazza re: landlord suit in Illinois	.30	157.50
2/27/25	SBP	CAS	Review UST changes to utility motion	.10	52.50
2/27/25	SBP	CAS	Review UST changes to bank account order	.10	52.50
2/27/25	SBP	CAS	Call with Lancaster Sheriff Office re: notice	.10	52.50
2/27/25	SBP	FEEAP	Revise motion for administrative fee order	.60	315.00
2/27/25	SBP	CAS	Review updated order to appoint examiner	.20	105.00
2/27/25	SBP	CAS	Call with M. Miceli re: joinder of chapter 11 trustee	.10	52.50
2/27/25	SBP	CAS	Review email from client in response to A. Ciardi questions on assets	.20	105.00
2/27/25	SBP	CAS	Communicate with US Trustee re: insurance	.10	52.50
2/27/25	SBP	CAS	Review order appointing examiner	.10	52.50
2/28/25	AS1	CAS	Draft and work on exam order	.60	435.00
2/28/25	AS1	CAS	Communicate with Sari B. Placona and Daryl Heller re: exam order	.30	217.50



Date	Atty	Task	Description	Hours	Amount
2/28/25	BBC	CAS	Email exchange with vendor re: Pennsylvania county judgments.	.10	19.00
2/28/25	JZ	DISP	Discussion with buyers' counsel re: the sale motion.	.60	225.00
2/28/25	SBP	CAS	Communicate with client re: wage garnishment	.10	52.50
2/28/25	SBP	CAS	Call with client re: garnishment	.20	105.00
2/28/25	SBP	CAS	Call with client and Truist Bank re: account status	.20	105.00
2/28/25	SBP	CAS	Email with J. Gold re: Fulton Bank	.10	52.50
2/28/25	SBP	AAR	Communicate with E. Goldstein re: sale addendum	.10	52.50
2/28/25	SBP	CAS	Communicate with S. Summers re: bank account	.10	52.50
2/28/25	SBP	CAS	Discuss examiner order with A. Sodono	.20	105.00
2/28/25	SBP	CAS	Call with client and A. Sodono re: examiner order	1.10	577.50
2/28/25	SBP	CAS	Communicate with A. Ciardi re: Brigantine	.10	52.50
2/28/25	SBP	LIT	Review notice of deposition on R. Leaman	.10	52.50
2/28/25	SBP	CAS	Review client comments to examiner order	.20	105.00
2/28/25	SBP	CAS	Email with Truist Bank re: bankruptcy documents	.10	52.50
2/28/25	SBP	CAS	Review Truist response to garnishment	.10	52.50
2/28/25	SBP	CAS	Call with A. Ciardi re: Truist	.20	105.00
2/28/25	SBP	CAS	Call with client re: bank account	.20	105.00

TOTAL PROFESSIONAL SERVICES

\$ 78,097.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
ISABELLA FISHER	5.40	250.00	1,350.00
ANTHONY SODONO, III	48.80	725.00	35,380.00
JOHN STERN	26.30	300.00	7,890.00
JOSEPH ZAPATA	27.40	375.00	10,275.00
SARI PLACONA	40.10	525.00	21,052.50
BERNADETTE B. CHILLEMI	2.80	190.00	532.00
KATHLEEN RILEY	1.00	190.00	190.00
MATTHEW R KELLY	1.20	190.00	228.00
STACY LIPSTEIN	6.00	200.00	1,200.00
Total	159.00		\$ 78,097.50



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75 Livingston Avenue, Roseland, NJ 07068 (973) 622-1800

DISBURSEMENTS

Description	Amount
Overnight Express Mail	502.40
Inside Duplicating	56.00
Westlaw	110.75
Postage	275.78
Filing Fee	1,283.00
PACER	99.60

TOTAL DISBURSEMENTS **\$ 2,327.53**

TOTAL THIS INVOICE **\$ 80,425.03**

April 9, 2025

Daryl Heller

Invoice #: 240545
Client #: 35240
Matter #: 1
Billing Attorney: SBP

INVOICE SUMMARY

For Professional Services Rendered Through March 31, 2025.

RE: Deerfield Capital, LLC - Bankruptcy Chapter 11

Total Professional Services	\$ 70,427.00
Total Disbursements	<u>\$ 2,016.21</u>
TOTAL THIS INVOICE	\$ 72,443.21
Previous Balance	<u>\$ 80,425.03</u>
TOTAL BALANCE DUE	<u>\$ 152,868.24</u>



PROFESSIONAL SERVICES

Date	Atty	Task	Description	Hours	Amount
3/02/25	AS1	CAS	Communicate with Sari B. Placona re: Leaman testimony and subpoenas	.30	217.50
3/02/25	AS1	CAS	Analyze and amend exam order and discuss with Sari B. Placona	.40	290.00
3/03/25	AS1	CAS	Multiple calls with Daryl Heller re strategy and exam order	.50	362.50
3/03/25	AS1	CAS	Call with client, L. Gibbons, H. Sorvino, and H. Freese re various testimony issues	.60	435.00
3/03/25	JZ	LIT	Reviewed email and notice of deposition to R. Leaman.	.10	37.50
3/03/25	JZ	DISP	Addressed with S. Placona re: preparation of a supplemental certification correcting the dates in the motion.	.10	37.50
3/03/25	JZ	DISP	Preparation of supplemental certification.	1.20	450.00
3/03/25	SBP	CAS	Revise examiner order	.20	105.00
3/03/25	SBP	CAS	Email with L. Gibbons re: examiner order	.10	52.50
3/03/25	SBP	CAS	Review Prestige statement in support of Chapter 11 trustee	.20	105.00
3/03/25	SBP	DISP	Call with R. Dressel re: sale hearing	.20	105.00
3/03/25	SBP	DISP	Revise supplemental certification in support of sale	.20	105.00
3/03/25	SBP	CAS	Call with H. Freese and A. Sodono re: status of case	.70	367.50
3/03/25	SBP	FEEAP	Call with client and SCH as potential accountant	.60	315.00
3/03/25	SBP	CAS	Call with A. Ciardi and A. Sodono re: examiner order	.40	210.00
3/03/25	SBP	CAS	Call with client re: examiner order	.10	52.50
3/03/25	SBP	CAS	Call with client, A. Sodono, H. Freese and H. Sorvino re: examiner order	.60	315.00
3/03/25	SBP	CAS	Review updated examiner order from A Ciardi	.20	105.00
3/04/25	AS1	CAS	Analyze, review, and revise examiner order	.60	435.00
3/04/25	AS1	CAS	Call with Leo and Daryl Heller re examiner order	.40	290.00
3/04/25	AS1	CAS	Communicate with Sari B. Placona, A. Ciardi, and H. Sorvino re examiner order	.60	435.00
3/04/25	AS1	CAS	Communicate with H. Freese re immunity issues	.40	290.00
3/04/25	AS1	CAS	Research immunity issues	.50	362.50
3/04/25	AS1	CAS	Call from A. Ciardi re discovery and venue issues	.60	435.00
3/04/25	AS1	CAS	Analyze and revise fee motion	.40	290.00
3/04/25	AS1	CAS	Communicate with Sari B. Placona re fee motion	.20	145.00
3/04/25	AS1	CAS	Communicate with client re Gold Cap A/R	.20	145.00
3/04/25	SBP	FEEAP	Call with client and Eisner Amper as potential accountant	.50	262.50
3/04/25	SBP	CAS	Review court opinion in Prestige v Paramount litigation	.20	105.00
3/04/25	SBP	CAS	Revise examiner order	.20	105.00
3/04/25	SBP	CAS	Review email from A. Ciardi responding to examiner order	.10	52.50



Date	Atty	Task	Description	Hours	Amount
3/04/25	SBP	CAS	Call with A. Sodono, L. Gibbons, H. Sorvino and client re: examiner order	.90	472.50
3/04/25	SBP	CAS	Call with client and C. Adams re: allegations	.40	210.00
3/04/25	SBP	CAS	Call with A. Ciardi re: order	.20	105.00
3/04/25	SBP	CAS	Call with client re: financial advisor	.10	52.50
3/04/25	SBP	FEEAP	Revise admin fee motion	.20	105.00
3/04/25	SBP	CAS	Revise suggestions of bankruptcy for litigation	.20	105.00
3/04/25	SBP	CAS	Review settlement offer to Deerfield Capital	.10	52.50
3/05/25	AS1	CAS	Call and emails with L. Gibbons re Deerfield settlement and exam order	.60	435.00
3/05/25	AS1	CAS	Call with H. Sorvino and A. Ciardi re examiner and status quo orders	.70	507.50
3/05/25	AS1	CAS	Call with L. Gibbons re TRO and injunction	.40	290.00
3/05/25	AS1	FEEAP	Call with A. Ciardi re retention of accountants	.20	145.00
3/05/25	AS1	CAS	Call with Daryl Heller re insolvency issues	.50	362.50
3/05/25	AS1	CAS	Call with Daryl Heller and L. Gibbons re exam order	.40	290.00
3/05/25	AS1	CAS	Communicate with client re Getter	.20	145.00
3/05/25	AS1	CAS	Call with Sari B. Placona, Daryl Heller, H. Sorvino, and L. Gibbons re status/strategy	.80	580.00
3/05/25	AS1	CAS	Numerous calls/emails with Sari B. Placona, Daryl Heller, L. Gibbons, and H. Sorvino re exam order, accounts, strategy, filings	3.60	2,610.00
3/05/25	AS1	CAS	Prepare for court and analyze motion, exhibits, outline issues, trustee, venue, lift-stay, examiner, stay	2.90	2,102.50
3/05/25	AS1	CAS	Multiple calls and emails with A. Ciardi re examiner	.80	580.00
3/05/25	SBP	CAS	Communicate with L. Gibbons re: order	.10	52.50
3/05/25	SBP	CAS	Communicate with H. Sorvino re: order	.10	52.50
3/05/25	SBP	CAS	Call with client and A. Sodono re: examiner order	.40	210.00
3/05/25	SBP	CAS	Communicate with R. Parisi re: Glorious LLC	.10	52.50
3/05/25	SBP	DISP	Email E. Goldstein re: status of rental of property	.10	52.50
3/05/25	SBP	CAS	Email A. Ciardi re: settlement offer for Deerfield Capital	.10	52.50
3/05/25	SBP	CAS	Call with A. Sodono, H. Sorvino, L. Gibbons and A. Ciardi re: examiner order	.50	262.50
3/05/25	SBP	CAS	Call with A. Sodono and L. Gibbons re: status	.20	105.00
3/05/25	SBP	CAS	Review Ciardi letter for Truist re: bank account	.10	52.50
3/05/25	SBP	CAS	Call with A. Sodono and H. Sorvino re: status	.20	105.00
3/05/25	SBP	CAS	Call with client and A. Sodono re: transfers	.20	105.00
3/05/25	SBP	CAS	Call with R. Dressel re: court hearing	.10	52.50
3/05/25	SBP	CAS	Call with client, H. Sorvino, and L. Gibbons re: status quo order	1.80	945.00
3/05/25	SBP	CAS	Call with client re: A. Ciardi comments to status quo order	.20	105.00



Date	Atty	Task	Description	Hours	Amount
3/05/25	SBP	CAS	Review and revise opposition to motion for chapter 11 trustee	.50	262.50
3/05/25	SBP	CAS	Call with A Ciardi and A Sodono	.20	105.00
3/05/25	SBP	CAS	Calls to discuss order with client, L Gibbons and A Sodono	2.60	1,365.00
3/06/25	AS1	TRVL	Travel to/from US Bankruptcy Court, Camden, NJ (Actual time 3.4)	1.70	1,232.50
3/06/25	AS1	CAS	Attend court hearing re exam motion, first-days	3.80	2,755.00
3/06/25	AS1	CAS	Analyze Deerfield settlement with Ciardi	.20	145.00
3/06/25	AS1	CAS	Analyze status quo order	.70	507.50
3/06/25	AS1	CAS	Analyze and revise exam order	.80	580.00
3/06/25	AS1	CAS	Review exam order and discuss with Sari B. Placona	.50	362.50
3/06/25	AS1	CAS	Multiple calls with D. Heller and A. Ciardi negotiating exam order	2.10	1,522.50
3/06/25	AS1	CAS	Multiple revisions of exam order	2.80	2,030.00
3/06/25	BBC	CAS	Revised UCC chart; forwarded same to S. Lipstein.	1.50	285.00
3/06/25	JZ	FEEAP	Drafted and sent email to the realtor re: retention order.	.10	37.50
3/06/25	SBP	CAS	Review suggestion of bankruptcy for Credibly suit	.10	52.50
3/06/25	SBP	CAS	Review resume of P. Chylinski	.10	52.50
3/06/25	SBP	CAS	Revise Examiner Order	.10	52.50
3/06/25	SBP	CAS	Call with client and H. Sorvino re: court hearing	.20	105.00
3/06/25	SBP	TRVL	Travel to court for first day motions (charge half)	1.30	682.50
3/06/25	SBP	CAS	Attend court hearing on first day motions	4.70	2,467.50
3/06/25	SBP	CAS	Call with L. Gibbons re: examiner order	.10	52.50
3/07/25	AS1	CAS	Analyze and multiple communications with Sari B. Placona. Daryl Heller, A. Ciardi and H. Sorvino re "final" order	1.40	1,015.00
3/07/25	SBP	CAS	Review A. Ciardi comments to examiner order	.10	52.50
3/07/25	SBP	CAS	Revise examiner order with L. Gibbons comments	.20	105.00
3/07/25	SBP	CAS	Review M. Weis comments to bank accounts order	.10	52.50
3/07/25	SBP	CAS	Review A. Ciardi comments to Examiner Order	.30	157.50
3/08/25	SBP	CAS	Email client re: examiner order duties	.10	52.50
3/08/25	SBP	CAS	Communicate with client re: examiner order	.20	105.00
3/08/25	SBP	CAS	Call with H. Sorvino re: examiner	.10	52.50
3/09/25	AS1	CAS	Communicate with D. Heller re corporate filings and strategy	.50	362.50
3/10/25	SBP	FEEAP	Review UST comments to admin fee motion order	.20	105.00
3/10/25	SBP	CAS	Revise letter to parties serving orders	.10	52.50
3/10/25	SBP	CAS	Review Glorious lease	.20	105.00
3/10/25	SBP	CAS	Call with client re: examiner	.10	52.50
3/10/25	SBP	CAS	Call with H. Sorvino re: status	.10	52.50
3/10/25	SBP	CAS	Communicate with IRS re: filings	.10	52.50
3/10/25	SBP	LIT	Revise letter to court re: status of removal action	.10	52.50



Date	Atty	Task	Description	Hours	Amount
3/11/25	AS1	CAS	Review and communicate with Daryl Heller and Sari B. Placona re HH tax returns disregarded entities	.30	217.50
3/11/25	AS1	CAS	Analyze Raw returns and discuss with Sari B. Placona	.50	362.50
3/11/25	SBP	CAS	Call with H. Sorvino re: status	.10	52.50
3/11/25	SBP	DISP	Review RAW Ventures operating agreement	.20	105.00
3/11/25	SBP	CAS	Call with client re: examiner	.10	52.50
3/11/25	SBP	CAS	Review Orrstown motion to transfer venue	.20	105.00
3/12/25	SBP	CAS	Email with R. Leaman re: Orrstown subpoena	.10	52.50
3/12/25	SBP	FEEAP	Revise order approving retention	.10	52.50
3/12/25	SBP	CAS	Email with A. Ciardi re: Raw Ventures	.10	52.50
3/12/25	SBP	LIT	Review emails from S. Heskin re: notice of removals needed for litigation	.20	105.00
3/12/25	SBP	CAS	Call with L. Gibbons re: status quo order	.10	52.50
3/12/25	SBP	CAS	Revise status quo order	.20	105.00
3/13/25	SBP	CAS	Call with S. Heskin and H. Sorvino and S. Lipstein re: removal actions	.40	210.00
3/13/25	SBP	CLAIM	Review claims filed by CAN Capital and Chase	.20	105.00
3/13/25	SBP	CLAIM	Review Amex claims	.20	105.00
3/13/25	SBP	LIT	Revise notice of removal for Credibly action	.10	52.50
3/13/25	SBP	CAS	Review of documents responsive to UST for IDI	.20	105.00
3/14/25	AS1	CAS	Analyze deposition notice and discuss with Sari B. Placona	.40	290.00
3/14/25	SBP	LIT	Review deposition notice to R. Leaman	.10	52.50
3/14/25	SBP	CAS	Review Prestige motion to compel discovery	.20	105.00
3/14/25	SBP	341	Email with H. Freese re: 341	.10	52.50
3/14/25	SBP	CAS	Call with client re: status	.30	157.50
3/15/25	AS1	LIT	Analyze and review Receiver's motion to approve sale in Fifth Third National Bank litigation	.60	435.00
3/16/25	AS1	CAS	Call with Sari B. Placona, Daryl Heller, and H. Sorvino re strategy	.50	362.50
3/16/25	AS1	CAS	Call with Sari B. Placona, Daryl Heller, H. Sorvino, and Adams re 341(a) Meeting	.40	290.00
3/16/25	AS1	CAS	Call with Daryl Heller re Deerfield settlement	.30	217.50
3/16/25	SBP	341	Call with client, A. Sodono, H. Freese, and C. Adams re: 341 meeting and status	1.20	630.00
3/17/25	MK	FEEAP	Drafted retention applications for Accountants for Debtor.	.50	95.00
3/17/25	MK	FEEAP	Drafted Retention Application for McCarter & English to be retained as Criminal Counsel for Debtor.	.30	57.00
3/17/25	SBP	CAS	Review application for order approving examiner, order appointing same; email client	.30	157.50



Date	Atty	Task	Description	Hours	Amount
3/17/25	SBP	CAS	Review application for order approving examiner, order appointing same	.30	157.50
3/17/25	SBP	CLAIM	Email with H. Goldner re: claim	.10	52.50
3/17/25	SBP	CLAIM	Review CFG Merchant claim	.10	52.50
3/17/25	SBP	LIT	Revise letter to Judge Towbin re: removal of Reliance action	.10	52.50
3/17/25	SBP	CAS	Call with client re status	.10	52.50
3/17/25	SBP	LIT	Review and revise notice of removal for Austin Business Finance	.30	157.50
3/17/25	SBP	341	Email parties re adjourning 341	.10	52.50
3/17/25	SBP	LIT	Review notice of removal for Reliance Platinum suit	.20	105.00
3/17/25	SBP	FEEAP	Review and revise retention application of accountant	.20	105.00
3/17/25	SBP	CAS	Email examiner with information per order	.20	105.00
3/18/25	AS1	LIT	Communicate with Daryl Heller re removal adversaries	.20	145.00
3/18/25	AS1	CAS	Review order, emails and attachments re Prestige and Paramount	.50	362.50
3/18/25	AS1	FEEAP	Revise examiner retention order and discuss with A. Ciardi	.20	145.00
3/18/25	BBC	CAS	Follow up email exchange with vendor as to all searches NJ and PA.	.10	19.00
3/18/25	MK	FEEAP	Drafted Letter serving Accountant Retention Application and Certification of Service.	.30	57.00
3/18/25	SBP	CAS	Review email from M Kizner re Prestige Order re sanctions and discovery	.20	105.00
3/18/25	SBP	CAS	Review case law from Prestige counsel and court documents re stay violation	.40	210.00
3/18/25	SBP	CAS	Call with M Kizner re stay violation	.10	52.50
3/19/25	AS1	CAS	Call from A. Ciardi re plan	.30	217.50
3/19/25	AS1	CAS	Call with Examiner and K. Gwynne	.20	145.00
3/19/25	MK	FEEAP	Revised Retention application for McCarter & English.	.40	76.00
3/19/25	MK	FEEAP	Finalized and Filed Retention Application for Accountants for Debtor.	.20	38.00
3/19/25	SBP	CAS	Call with E Phillips, K Gwyne, and A Sodono re examiner order	.40	210.00
3/19/25	SBP	CLAIM	Review IRS claim	.10	52.50
3/19/25	SBP	CAS	Communicate with J McNulty re tax return	.10	52.50
3/19/25	SBP	LIT	Review submission of record on Reliance case removal action	.20	105.00
3/19/25	SBP	CAS	Review statement of receiver	.10	52.50
3/19/25	SBP	CAS	Email M Weiss re deposition	.10	52.50
3/19/25	SBP	FEEAP	Email J McNulty re retention application	.10	52.50
3/19/25	SBP	DISP	Call with N Isaacson re sale and R Leaman	.20	105.00
3/19/25	SBP	FEEAP	Revise letter to parties service accountant retention	.10	52.50
3/19/25	SBP	FEEAP	Revise application to retain criminal counsel	.30	157.50



Date	Atty	Task	Description	Hours	Amount
3/19/25	SBP	CAS	Email with client re tax returns	.10	52.50
3/19/25	SBP	LIT	Review Prestige v Heller complaint	.20	105.00
3/20/25	AS1	FEEAP	Analyze and amend Adams certification, application and proposed order	.60	435.00
3/20/25	AS1	FEEAP	Communicate with C. Adams re McCarter retention	.20	145.00
3/20/25	AS1	CAS	Communicate with L. Gibbons re various family issues	.30	217.50
3/20/25	AS1	CAS	Communicate with A. Ciardi re venue and lift-stay	.30	217.50
3/20/25	AS1	CAS	Communicate with J. McNulty re tax issues and claims	.40	290.00
3/20/25	AS1	CAS	Communicate with Leone re court orders	.20	145.00
3/20/25	SBP	FEEAP	Email C Adams with retention application for review	.20	105.00
3/20/25	SBP	DISP	Email with J Gold re status of sale	.10	52.50
3/20/25	SBP	CAS	Review Citibank statement	.10	52.50
3/20/25	SBP	CAS	Review letter from L Gibbons to examiner re order	.20	105.00
3/21/25	SBP	CAS	Call with M Weis and A Sodono re transfer venue	.40	210.00
3/21/25	SBP	FEEAP	Revise letter serving retention applications	.10	52.50
3/21/25	SBP	CAS	Call with H Sorvino re status of company filings	.20	105.00
3/21/25	SBP	CAS	Review documents for UST in preparation for 341 and IDI	.70	367.50
3/21/25	SBP	CAS	Call with A Ciardi and H Sorvino re examiner order	.30	157.50
3/23/25	AS1	LIT	Review 3/18/2025 Orrstown Rule to Show Cause with supporting Petition, Memorandum of Law, and exhibits	.60	435.00
3/24/25	AS1	CAS	Call with Sari B. Placona, client, and N. Young re Acordo transaction	.30	217.50
3/24/25	AS1	CAS	Communicate with Sari B. Placona and Daryl Heller re Raw and Paramount	.20	145.00
3/24/25	AS1	LIT	Analyze statement on appeal, praepice, Paramount, stay, order	.40	290.00
3/24/25	JDS	CAS	Review file and provide certficiaiton in support of opposition to stay motion to S. Placona.	.10	30.00
3/24/25	JZ	DISP	Reviewed email re: redlined change needed to the proposed sale order.	.10	37.50
3/24/25	JZ	DISP	Reviewed Section 345(b) and revised/ redlined the sale order.	.20	75.00
3/24/25	JZ	DISP	Drafted and sent email to S. Placona re: revised sale order.	.10	37.50
3/24/25	SBP	FEEAP	Review retention application of Reed Smith as counsel to examiner	.20	105.00
3/24/25	SBP	CAS	Call with Q Miller, L Young, and A Sodono re transaction	.40	210.00
3/24/25	SBP	CAS	Review Orrstown answer and affirmative defenses	.20	105.00
3/24/25	SBP	CAS	Call with A Ciardi re transfer motion	.20	105.00
3/24/25	SBP	CAS	Revise opposition to motion to transfer venue	.60	315.00
3/24/25	SBP	CAS	Call with H Sorvino re examiner order	.20	105.00
3/24/25	SBP	CAS	Call with client, H Sorvino, A Sodono and client re status	.40	210.00



Date	Atty	Task	Description	Hours	Amount
3/25/25	JDS	CAS	Review state court counsel email regarding issue concernring state court sanction order and whether stay applies and write email with analysis to S. Placona.	1.20	360.00
3/25/25	JDS	CAS	Review state court counsel email regarding issue concernring state court sanction order and whether stay applies and finish writing email with analysis to S. Placona.	.30	90.00
3/25/25	JDS	CAS	Draft letter to Judge Brown in Pennslyvania Court action regarding Sanction Order and violaiton of the Automatic Stay.	1.50	450.00
3/25/25	JDS	CAS	Revise Opposition to Deerfield and Orrstown Motion to transfer venue, etc.	1.50	450.00
3/25/25	SBP	LIT	Revise submission of record in Austin Business removal notice	.20	105.00
3/25/25	SBP	LIT	Review Deerfield answer to complaint	.20	105.00
3/25/25	SBP	CLAIM	Review claim of C Heller	.10	52.50
3/25/25	SBP	CAS	Email with D Prill re RAW Ventures financials	.10	52.50
3/25/25	SBP	LIT	Revise submission of record for Prestige lawsuit	.20	105.00
3/25/25	SBP	DISP	Review objections to sale by Deerfield and	.20	105.00
3/25/25	SBP	CAS	Email with C Adams re examiner role	.10	52.50
3/25/25	SBP	CAS	Revise oppositoion to motion to transfer venue	.90	472.50
3/25/25	SBP	LIT	Review notice of removal for Prestige Fund suit	.10	52.50
3/25/25	SBP	CAS	Call with H Sorvino re status	.20	105.00
3/25/25	SBP	CAS	Review email re appeal case	.10	52.50
3/25/25	SBP	CAS	Communicate with client re examiner and information to be provided	.40	210.00
3/25/25	SBP	DISP	Review response of Charlene Heller re sale	.20	105.00
3/25/25	SBP	CAS	Review Form 426	.10	52.50
3/25/25	SBP	CAS	Revise letter to Judge Brown re violation of stay	.20	105.00
3/25/25	SBP	CAS	Call with K Kisphaugh re investigation	.20	105.00
3/25/25	SBP	CAS	Call with H Freese re status	.20	105.00
3/26/25	JDS	CAS	Revise Opposition and certificaition in support, to Deerfield and Orrstown motion to transfer venue, stay relief, etc.	2.40	720.00
3/26/25	JDS	CAS	Research issue of automatic stay not applying to state court appeal, draft letter to Penn. App. Ct. to continue state court appeal.	1.70	510.00
3/26/25	JDS	CAS	Revise letter to Penn. App. Ct. to continue state court appeal.	.40	120.00
3/26/25	SBP	CAS	Call with E Phillips, K Gwyne, client, and C Adams re examiner order and investigation	1.20	630.00
3/26/25	SBP	CAS	Call with C Adams and client re examiner call	.30	157.50
3/26/25	SBP	CAS	Revise opposition to Deerfield and Orrstown stay relief and transfer venue motion	2.40	1,260.00
3/26/25	SBP	CAS	Review subpoena from Deerfield to attend hearing	.10	52.50
3/26/25	SBP	DISP	Email with R Dressel re sale	.10	52.50



Date	Atty	Task	Description	Hours	Amount
3/26/25	SBP	CAS	Review Silverview objection to motion to transfer venue	.20	105.00
3/26/25	SBP	CAS	Email with J Sponder re sale	.10	52.50
3/26/25	SBP	CAS	Review and revise motion for summary judgment against Orrstown and Deerfield	.70	367.50
3/26/25	SBP	CAS	Call with client on follow up from examiner	.30	157.50
3/26/25	SBP	CAS	Call with H Sorvino and client re company status	.30	157.50
3/26/25	SBP	CAS	Email with J Atchison re Glorious financials	.10	52.50
3/27/25	IDF	LIT	Edit and revise draft for Summary Judgment motion.	1.40	350.00
3/27/25	JDS	CAS	Research caselaw and write memo on difference between sanctions brought by court's inherent contempt power, versus sanctions for enforcement of private rights.	1.50	450.00
3/27/25	SBP	CAS	Email D Prill re Raw Ventures information	.10	52.50
3/27/25	SBP	341	Email client and C Adams 341 questions	.10	52.50
3/27/25	SBP	FEEAP	Revise letter serving accountant order	.10	52.50
3/27/25	SBP	CLAIM	Review claim of Chicago Atlantic	.10	52.50
3/27/25	SBP	DISP	Email with N Isaacson re sale order	.10	52.50
3/27/25	SBP	CLAIM	Review First National Bank claim	.10	52.50
3/27/25	SBP	FEEAP	Email with J Sponder re criminal counsel retention application	.10	52.50
3/27/25	SBP	341	Call with client re 341 prep	.20	105.00
3/27/25	SBP	341	Call with C Adams re 341 prep	.20	105.00
3/27/25	SBP	CAS	Revise motion for summary judgment against Deerfield and Orrstown	.60	315.00
3/27/25	SBP	CAS	Respond to examiner with information	.20	105.00
3/28/25	AS1	CAS	Communicate with Daryl Heller and L. Gibbons re status/strategy	.60	435.00
3/28/25	AS1	LIT	Analyze and work on summary judgment motion, brief, certification, and proposed order	2.90	2,102.50
3/28/25	JDS	CAS	Revise letter to Judge Brown with caselaw and explanation why the civil contempt proceeding exception to auto stay does not apply to the State Court Sanction Order.	.60	180.00
3/28/25	SBP	CAS	Review client 13 week budget	.20	105.00
3/28/25	SBP	FEEAP	Review Orrstown reservation of rights objection to McCarter retention application	.10	52.50
3/28/25	SBP	FEEAP	Review objection by Deerfield to McCarter retention	.10	52.50
3/28/25	SBP	DISP	Email with J Dankers re Fulton mortgage of Sea Isle	.10	52.50
3/28/25	SBP	CAS	Call with L Gibbons, A Sodono, and client re Orrstown status	.40	210.00
3/28/25	SBP	CAS	Review client workbook to respond to examiner requests	.40	210.00
3/28/25	SBP	CAS	Review email from L Gibbons re discussions with Orrstown Bank	.20	105.00
3/28/25	SBP	CAS	Revise letter to Judge Brown re automatic stay	.10	52.50



Date	Atty	Task	Description	Hours	Amount
3/28/25	SBP	CAS	Call with M Fencer re Glorious entities and documents to receiver	.20	105.00
3/28/25	SBP	CAS	Communicate with K Gwyne re follow up for examiner	.10	52.50
3/28/25	SBP	FEEAP	Revise objection to retention of Reed Smith	.20	105.00
3/28/25	SBP	CAS	Review Prestige motion for order confirming stay not in place	.20	105.00
3/28/25	SBP	CAS	Call with client re Prestige motion re stay relief	.30	157.50
3/29/25	SBP	341	Call with client re 341	.20	105.00
3/31/25	AS1	TRVL	Travel to/from McCarter & English, Newark, NJ (One-Half charge; actual time 0.8)	.40	290.00
3/31/25	AS1	341	Prepare for 341(a) Meeting of Creditors, analyze documents and financials, and meet with client pre meeting	2.10	1,522.50
3/31/25	AS1	341	Attend 341(a) Meeting of Creditors (via teleconference)	2.90	2,102.50
3/31/25	AS1	341	Attend Initial Debtor Interview and post discussion with client	.80	580.00
3/31/25	SBP	341	Attend 341a meeting of creditors	3.30	1,732.50
3/31/25	SBP	341	Attend meeting at McCarter & English regarding 341a meeting of creditors	1.20	630.00
3/31/25	SBP	CAS	Review email from L Gibbons re Orrstown settlement	.10	52.50
3/31/25	SBP	FEEAP	Revise objection to Reed Smith retention	.10	52.50
3/31/25	SBP	CAS	Attend initial debtor interview	.80	420.00
3/31/25	SBP	TRVL	Travel to McCarter & English for meeting (half time charge)	.60	315.00
3/31/25	SBP	CAS	Review Orrstown reply to oppositon to transfer venue	.20	105.00
3/31/25	SBP	CAS	Review client responses to examiner follow up	.20	105.00

TOTAL PROFESSIONAL SERVICES

\$ 70,427.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
ISABELLA FISHER	1.40	250.00	350.00
ANTHONY SODONO, III	48.90	725.00	35,452.50
JOHN STERN	11.20	300.00	3,360.00
JOSEPH ZAPATA	1.90	375.00	712.50
SARI PLACONA	57.00	525.00	29,925.00
BERNADETTE B. CHILLEMI	1.60	190.00	304.00
MATTHEW R KELLY	1.70	190.00	323.00
Total	123.70		\$ 70,427.00



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DISBURSEMENTS

Description	Amount
Travel/Parking Expenses	147.59
Miscellaneous Expenses	521.00
Postage	244.64
Filing Fee	1,050.00
Westlaw	52.98

TOTAL DISBURSEMENTS **\$ 2,016.21**

TOTAL THIS INVOICE **\$ 72,443.21**



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May 7, 2025

Daryl Heller

Invoice #: 241099
Client #: 35240
Matter #: 1
Billing Attorney: SBP

INVOICE SUMMARY

For Professional Services Rendered Through April 30, 2025.

RE: Deerfield Capital, LLC - Bankruptcy Chapter 11

Total Professional Services	\$ 92,998.00
Total Disbursements	<u>\$ 1,599.75</u>
TOTAL THIS INVOICE	\$ 94,597.75



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PROFESSIONAL SERVICES

Date	Atty	Task	Description	Hours	Amount
4/01/25	AS1	CAS	Call with M. Weis re: sale of assets, settlement, transfer	.30	217.50
4/01/25	AS1	LIT	Communicate with client re: stipulation of settlement with Orrstown and draft same	.30	217.50
4/01/25	IDF	LIT	Revised motion re: summary judgment motion to include 3rd Orrstown judgment and updated attached exhibits.	.60	150.00
4/01/25	SBP	CAS	Call with M. Weiss and A. Sodono re: status of court hearings	.60	315.00
4/01/25	SBP	AVOID	Revise motion for summary judgment	.50	262.50
4/01/25	SBP	AAR	Revise sale order	.20	105.00
4/01/25	SBP	CAS	Calls with client and A. Sodono to discuss examiner and status quo order	2.60	1,365.00
4/01/25	SBP	CAS	Call with A. Ciardi and A. Sodono re: status	.20	105.00
4/01/25	SBP	CAS	Review and revise opposition to motion for chapter 11 trustee	.50	262.50
4/01/25	SBP	CAS	Call with client re: Orrstown position	.10	52.50
4/02/25	AS1	DISP	Prepare for Court re: sale hearing and analyze pleadings and objections	.90	652.50
4/02/25	AS1	TRVL	Travel to/from US Bankruptcy Court, Camden, NJ (ACTUAL TIME 2.9)	1.40	1,015.00
4/02/25	AS1	DISP	Attend sale hearing	1.30	942.50
4/02/25	MK	CAS	Filed Certification of Service for Summary Judgment Motion in Adv Proceeding.	.10	19.00
4/02/25	MMD	DISP	Review title report; review sale issues	.50	280.00
4/02/25	SBP	CAS	Review email from L. Gibbons re: Orrstown terms of forbearance	.20	105.00
4/02/25	SBP	AAR	Email with J. Gold re: sale	.10	52.50
4/02/25	SBP	TRVL	Travel to court (half charge)	1.50	787.50
4/02/25	SBP	CAS	Prepare for court hearing on sale and transfer motions	1.40	735.00
4/02/25	SBP	CAS	Attend court hearing	1.30	682.50
4/02/25	SBP	CAS	Call with client and A. Sodono re: hearing status	.30	157.50
4/02/25	SBP	TRVL	Travel to office from court (half charge)	1.50	787.50
4/03/25	AS1	CAS	Communicate with Examiner re: order	.20	145.00
4/03/25	AS1	CAS	Communicate with L. Gibbons re: settlement with Orrstown and state court TRO	.40	290.00
4/03/25	MK	CAS	Drafted and Served Letter serving Order Authorizing Sale of Real Property and Order Authorizing Administrative Fees.	.30	57.00
4/03/25	MMD	DISP	Review updated title and sale order; review various e-mails from title company re: closing date and respond	1.00	560.00
4/03/25	SBP	CAS	Communicate with UST re: insurance on property	.10	52.50
4/03/25	SBP	AAR	Revise sale order	.20	105.00



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Date	Atty	Task	Description	Hours	Amount
4/03/25	SBP	CAS	Email examiner re: information	.10	52.50
4/03/25	SBP	CAS	Email with A. Ciardi re: UCC status	.10	52.50
4/03/25	SBP	CAS	Revise letter serving sale order and admin fee order	.10	52.50
4/03/25	SBP	FEEAP	Call with C. Adams and A. Sodono re: retention application	.20	105.00
4/04/25	AS1	CAS	Analyze R. 2004 Subpoena to Amex, Applepay, Cash app, Paypal and draft email to A. Ciardi re: same	.80	580.00
4/04/25	JZ	DISP	Reviewed emails re: the deed package and the Fulton payoff.	.10	37.50
4/04/25	JZ	DISP	Reviewed several emails re: the date of the closing and the removal of items from the property.	.10	37.50
4/04/25	MMD	DISP	Review updated title report; draft closing documents	2.20	1,232.00
4/04/25	SBP	CAS	Email J. Gold re: Fulton Bank payoff	.10	52.50
4/04/25	SBP	AAR	Revise letter to E. Williams re: status of sale objections	.20	105.00
4/04/25	SBP	CAS	Review email from L. Gibbons re: payment to Orrstown	.10	52.50
4/04/25	SBP	CLAIM	Review Prestige Fund claims	.20	105.00
4/04/25	SBP	CAS	Review subpoena from Deerfield Capital	.10	52.50
4/04/25	SBP	CAS	Review notice of depositoin	.10	52.50
4/04/25	SBP	CAS	Call with A. Ciardi re: status of subpoenas	.20	105.00
4/04/25	SBP	CAS	Call with K. Gwynne and A. Sodono re: examiner duties	.40	210.00
4/04/25	SBP	CAS	Call with H. Sorvino re: status of examiner	.20	105.00
4/04/25	SBP	CAS	Call with C. Adams re: DOJ status	.20	105.00
4/04/25	SBP	CAS	Call with client and L. McDonough re: crisis information and status	.50	262.50
4/04/25	SBP	CAS	Call with R. Dressel re: closing	.20	105.00
4/04/25	SBP	CAS	Call with J. Sponder re: bank account and criminal counsel retention	.20	105.00
4/05/25	AS1	CAS	Call with Sari B. Placona, A. Ciardi, and H. Sorvino re: settlement issues with Deerfield, status of claims/strategy	.90	652.50
4/05/25	MMD	DISP	Draft e-mail to N. Isaacson forwarding sale documents	.20	112.00
4/05/25	SBP	CAS	Communicate with client re: Form 426	.20	105.00
4/05/25	SBP	CAS	Review letter from SEC requesting information	.20	105.00
4/05/25	SBP	CAS	Review Deerfield subpoenas to third parties	.20	105.00
4/05/25	SBP	CAS	Review items for 341 amendments	.20	105.00
4/05/25	SBP	FEEAP	Review application to retain Getzler Heinrich as counsel to examiner	.10	52.50
4/05/25	SBP	CAS	Review Gallimore Properties stay relief motion	.20	105.00
4/05/25	SBP	CAS	Call with client, A. Sodono, and H. Sorvino re: status of Deerfield motion	1.00	525.00
4/06/25	AS1	DISP	Communicate with Goldstein re: sale of Sea Isle property	.20	145.00
4/06/25	SBP	CAS	Email A. Ciardi re: examiner budget	.10	52.50
4/06/25	SBP	AVOID	Email A. Ciardi re: meeting to discuss settlement	.10	52.50



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Date	Atty	Task	Description	Hours	Amount
4/07/25	AS1	CAS	Zoom with Sari B. Placona, H. Sorvino, and D. Heller re: strategy issues, litigation, trustee, examiner	1.40	1,015.00
4/07/25	MMD	DISP	Various e-mails addressing sale issues; revise closing documents and forward to title company; review initial HUD; review issues relating to post-petition judgments	1.00	560.00
4/07/25	SBP	CAS	Email with A. Ciardi re: subpoenas	.10	52.50
4/07/25	SBP	CAS	Email J. Gold re: status of payoff	.10	52.50
4/07/25	SBP	CAS	Call with J. McNulty re: operating report	.10	52.50
4/07/25	SBP	FEEAP	Review email from UST re: criminal counsel retention	.10	52.50
4/07/25	SBP	CAS	Review 2004 subpoena from Prestige Funds	.20	105.00
4/07/25	SBP	CAS	Email with insurance company re: certificate	.10	52.50
4/07/25	SBP	CAS	Review letter to Judge Brown with notice of removal	.10	52.50
4/07/25	SBP	CAS	Call with client, A. Sodono, H. Sorvino, and J. Vandermark re: status of case	1.30	682.50
4/07/25	SBP	AAR	Email with client and R. Leaman re: closing	.20	105.00
4/08/25	AS1	DISP	Communicate with W. William re: title and closing	.20	145.00
4/08/25	AS1	DATA	Analyze Orrstown subpoenas	.20	145.00
4/08/25	AS1	CAS	Review release from A. Ciardi re: Deerfield	.20	145.00
4/08/25	AS1	DATA	Analyze "workbook" financial issues	.90	652.50
4/08/25	AS1	DATA	Analyze case law re: venue and transfer	1.30	942.50
4/08/25	AS1	CAS	Discuss with Sari B. Placona and John D. Stern venue and transfer	.30	217.50
4/08/25	AS1	CAS	Zoom with Sari B. Placona, H. Sorvino, and A. Ciardi re: various Deerfield issues	.50	362.50
4/08/25	MMD	DISP	Finalize sale issues and closing documents	.80	448.00
4/08/25	SBP	CAS	Review Orrstown subpoena for hearing	.10	52.50
4/08/25	SBP	CLAIM	Review Deerfield Capital claim	.10	52.50
4/08/25	SBP	CAS	Zoom call with client, A. Sodono, and H Sorvino re: Deerfield meeting	1.30	682.50
4/08/25	SBP	CAS	Review Needham Bank lawsuits	.20	105.00
4/08/25	SBP	AAR	Call with E. Wilkins re: closing	.10	52.50
4/08/25	SBP	AAR	Review emails re: sale closing and judgments for sale of NJ property	.20	105.00
4/08/25	SBP	CAS	Review release of judgments	.20	105.00
4/08/25	SBP	CAS	Review settlement workbook from client	.30	157.50
4/09/25	AS1	TRVL	Travel to/from Trenton, NJ (ACTUAL TIME 2.6)	1.30	942.50
4/09/25	AS1	CAS	Attend meeting with client, Deerfield counsel and representatives, H. Sorvino re: settlement discussions and post meeting with client	5.50	3,987.50
4/09/25	AS1	CAS	Review certificate of liability	.20	145.00



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Date	Atty	Task	Description	Hours	Amount
4/09/25	MMD	DISP	Address various sale issues; confirm closing and review documents relating to same	.70	392.00
4/09/25	SBP	CAS	Communicate with J. Sponder re: insurance	.10	52.50
4/09/25	SBP	CAS	Review HH workbook for meeting with Deerfield	.30	157.50
4/09/25	SBP	CAS	Review Orrstown forbearance agreement	.50	262.50
4/10/25	IDF	LIT	Begin drafting opposition to motion re: order lifting stay.	.40	100.00
4/10/25	SBP	CAS	Email with M. Weiss re: insurance	.10	52.50
4/10/25	SBP	CAS	Email client re: status of Gallimore Properties	.10	52.50
4/10/25	SBP	CAS	Call with client re: status of MOR	.30	157.50
4/11/25	IDF	LIT	Draft 2004 subpoena re: Prestige. Submitted to supervising atty for review.	1.30	325.00
4/11/25	IDF	LIT	Draft motion to quash prestige 2004 subpoena. Submitted to supervising atty for review.	3.30	825.00
4/11/25	IDF	LIT	Began drafting opp re: prestige motion re: stay/civil contempt.	.50	125.00
4/11/25	JDS	CAS	Review emails and send informaiton for assignment to draft Motion to Quash Subpoena, draft email with context.	.50	150.00
4/11/25	SBP	CAS	Email with J. Atchinson re: Gallimore stay relief motion	.10	52.50
4/11/25	SBP	CAS	Review Orrstown exhibits in support of motion to transfer venue	.20	105.00
4/11/25	SBP	CAS	Review February MOR	.10	52.50
4/11/25	SBP	CAS	Call with client re: strategy	.30	157.50
4/11/25	SBP	CAS	Discuss Gallimore Properties motion for stay relief	.20	105.00
4/11/25	SBP	CAS	Revise cease and desist letter	.10	52.50
4/11/25	SBP	CAS	Review examiner budget	.20	105.00
4/11/25	SBP	CAS	Call with C. Adams re: DOJ status	.10	52.50
4/11/25	SBP	AVOID	Review Deerfield term sheet	.30	157.50
4/11/25	SBP	CAS	Call with K. Gwyne re: subpoenas	.10	52.50
4/11/25	SBP	AVOID	Review Orrstown forbearance agreement	.60	315.00
4/12/25	AS1	DATA	Analyze transfer issues and raw venture issue	.80	580.00
4/12/25	AS1	CAS	Call with A. Ciardi re: settlement	.20	145.00
4/12/25	AS1	LIT	Analyze Orrstown settlement agreement	.60	435.00
4/12/25	AS1	LIT	Communicate with Sari B. Placona and L. Gibbons re: Orrstown settlement	.20	145.00
4/12/25	SBP	CAS	Call with client and H. Sorvino re: Deerfield term sheet	.80	420.00
4/12/25	SBP	CAS	Revise term sheet	.90	472.50
4/12/25	SBP	CAS	Calls with H. Sorvino re: Deerfield term sheet	.40	210.00
4/12/25	SBP	CAS	Call with client and H. Sorvino re: Deerfield term sheet	.30	157.50
4/13/25	AS1	CAS	Analyze multiple text messages re: Deerfield settlement and analyze term sheet	.80	580.00
4/13/25	SBP	AVOID	Call with client and H. Sorvino re: Deerfield term sheet	.40	210.00



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Date	Atty	Task	Description	Hours	Amount
4/13/25	SBP	BOPS	Revise motion to quash Prestige subpoena	.20	105.00
4/13/25	SBP	CAS	Revise 2004 subpoena to Prestige	.10	52.50
4/13/25	SBP	BOPS	Review RAW Ventures financials	.20	105.00
4/13/25	SBP	AVOID	Email M. Weiss re: status of transfer motion	.10	52.50
4/13/25	SBP	AVOID	Review Deerfield comments to term sheet	.20	105.00
4/14/25	AS1	CAS	Call with Sari B. Placona, D. Heller, and H. Sorvino re: Deerfield settlement	.90	652.50
4/14/25	AS1	DATA	Analyze multiple subpoenas and discuss with Sari B. Placona and Daryl Heller	.80	580.00
4/14/25	AS1	CAS	Call with Sari B. Placona, Daryl Heller, H. Sorvino, Paul, and Eric	1.80	1,305.00
4/14/25	AS1	CAS	Zoom call with Daryl Heller and Heidi Sorvino re: strategy, status, settlement agreement	1.30	942.50
4/14/25	AS1	CAS	Call with Sari B. Placona Daryl Heller re: Deerfield	.50	362.50
4/14/25	JDS	CAS	Draft Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	.50	150.00
4/14/25	JDS	CAS	Draft Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	.70	210.00
4/14/25	JDS	CAS	Review Prestige's Motion for Stay Relief in order to draft Draft Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	.70	210.00
4/14/25	SBP	AVOID	Call with client, A. Sodono, and H. Sorvino re: status of Deerfield settlement	1.10	577.50
4/14/25	SBP	CAS	Review revise term sheet with Deerfield	.20	105.00
4/14/25	SBP	CAS	Call with A. Ciardi and H. Sorvino re: settlement of term sheet	.80	420.00
4/14/25	SBP	AVOID	Revise term sheet with Deerfield Capital	.30	157.50
4/14/25	SBP	CLAIM	Review Blackford claims	.20	105.00
4/14/25	SBP	CAS	Review examiner's subpoenas	.40	210.00
4/14/25	SBP	PDS	Review Unity Bank response to Plan	.10	52.50
4/14/25	SBP	AVOID	Review revised Orrstown agreement	.20	105.00
4/14/25	SBP	CAS	Follow up call with client, H. Sorvino, and A. Sodono re: status	.30	157.50
4/14/25	SBP	BOPS	Zoom call with A. Ciardi, H. Sorvino, A. Sodono, and client	1.50	787.50
4/15/25	AD	LIT	Review Pennsylvania Appellate Docket and pleadings; conference with S. Platon re: procedural posture of appeal; conference with S. Placona re: strategy in pursuing same.	1.30	728.00
4/15/25	AS1	CAS	Review 52 text messages re: settlement issues	.90	652.50
4/15/25	AS1	CAS	Call with client re: Deerfield settlement	.50	362.50
4/15/25	AS1	CAS	Call with client re: post settlement call with A. Ciardi	.60	435.00
4/15/25	JDS	CAS	Draft Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	1.90	570.00



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Date	Atty	Task	Description	Hours	Amount
4/15/25	JDS	CAS	Research caselaw for Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	.50	150.00
4/15/25	JDS	CAS	Research caselaw for Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	.20	60.00
4/15/25	JHR	CLAIM	Reviewed Claims Register and Prestige Claims. Started to draft Motion objecting to claims drafted Notice of Motion and proposed form of order. Reviewed background facts.	2.60	1,456.00
4/15/25	SBP	CAS	Call with client, H. Sorvino, and A. Sodono re: status with Deerfield settlement	.60	315.00
4/15/25	SBP	CAS	Review PA court order staying Orrstown suit	.10	52.50
4/15/25	SBP	CAS	Review examiner subpoena to Community Choice	.10	52.50
4/15/25	SBP	ACCT	Zoom team meeting on issues to catch up on status	1.50	787.50
4/15/25	SBP	AVOID	Review email from L. Gibbons on Orrstown settlement terms	.10	52.50
4/15/25	SBP	AVOID	Call with A. Ciardi, H. Sorvino, and A. Sodono re: settlement	.40	210.00
4/15/25	SBP	AVOID	Call with client and A. Sodono re: Deerfield term sheet	.40	210.00
4/15/25	SBP	CAS	Call with H. Sorvino, A. Ciardi, and A. Sodono re: status	.50	262.50
4/15/25	SBP	AVOID	Email with L. Gibbons re: Orrstown term sheet	.10	52.50
4/15/25	SBP	AVOID	Call with M. Weiss re: status	.20	105.00
4/15/25	SBP	CAS	Call with client and A. Sodono re: status	.30	157.50
4/15/25	SBP	AVOID	Revise Deerfield term sheet	.30	157.50
4/15/25	SDP	LIT	Review and analyze file (inc. lower court opinion in state court) in preparation for possible appellate court action.	.70	199.50
4/15/25	SDP	AAR	Review of PA appellate docket, inc. statement of errors complained upon appeal.	1.00	285.00
4/15/25	SDP	LIT	Review of PA appellate procedure in re: amending statement of errors.	.20	57.00
4/16/25	AD	LIT	Conference with client, S. Placona and S. Platten re: strategic decision regarding pursuing PA appeal; conference with S. Platten re: starting to analyze.	1.00	560.00
4/16/25	AD	LIT	Conference with S. Platten re: review of Lancaster docket.	.10	56.00
4/16/25	AS1	CAS	Analyze multiple emails with Sari B. Placona and Daryl Heller re: Deerfield settlement and discuss with Sari B. Placona	.60	435.00
4/16/25	JDS	CAS	Draft Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	1.20	360.00
4/16/25	JDS	CAS	Revise Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	2.10	630.00
4/16/25	JDS	CAS	Revise Opposition to Prestige Stay Relief Motion and Cross Motion for Sanctions and Stay Relief.	1.40	420.00
4/16/25	JDS	CAS	Draft opposition to Prestige motion and cross motion for sanction and stay relief.	2.60	780.00
4/16/25	JDS	CAS	Further revise opposition to Prestige Motion and cross motion for sanctions and stay relief.	.50	150.00



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Date	Atty	Task	Description	Hours	Amount
4/16/25	JDS	CAS	Review and revise opposition to Prestige Motion and cross motion for sanctions and stay relief.	1.00	300.00
4/16/25	JHR	CLAIM	Continued to draft Motion and Certificaion in support of Motion to Expunge Claims of Prestige.	1.30	728.00
4/16/25	SBP	CAS	Call with client re: status of Orrstown	.20	105.00
4/16/25	SBP	BA	Call with client, A. Dobin, and S. Platton re: Appeal call	.80	420.00
4/16/25	SBP	CLAIM	Review Wilmington Savings Fund claim	.10	52.50
4/16/25	SBP	AVOID	Call with client and H. Sorvino re: term sheet	.90	472.50
4/16/25	SBP	AVOID	Call with A. Ciardi and H. Sorvino re: Deerfield term sheet	.30	157.50
4/16/25	SBP	AVOID	Call with client and H. Sorvino re: Deerfield term sheet	.80	420.00
4/16/25	SBP	AVOID	Revise term sheet with Deerfield	.20	105.00
4/16/25	SBP	AVOID	Review Deerfield comments to term sheet	.20	105.00
4/16/25	SBP	CAS	Review client comments to Prestige subpoena	.10	52.50
4/16/25	SBP	CAS	Revise 2004 subpoena to Prestige Fund	.20	105.00
4/16/25	SBP	FEEAP	Call with J. Sponder re: criminal counsel retention	.20	105.00
4/16/25	SBP	AVOID	Call with M. Weiss re: status of settlement	.20	105.00
4/16/25	SBP	BOPS	Call with client re: status	.30	157.50
4/16/25	SDP	LIT	Meeting with client, Andrea Dobin, and Sari Placona.	.80	228.00
4/16/25	SDP	CAS	Review of state court docket and filings.	2.00	570.00
4/17/25	AS1	STAY	Review and draft Wilmington stay letter	.30	217.50
4/17/25	AS1	DATA	Analyze numerous text messages with Sari B. Placona, Daryl Heller, and Heidi Sorvino re: Deerfield settlement	.60	435.00
4/17/25	AS1	CAS	Call with Daryl Heller and Sari B. Placona re: Orrstown settlement, status quo order, transfers, assets	.70	507.50
4/17/25	AS1	CAS	Communicate with client re: motion to quash Paramount, opposition, cross-motion, and examiner duties and analyze documents	.70	507.50
4/17/25	JDS	CAS	Research caselaw on Court's authority to revise costs associated with Examiner.	.60	180.00
4/17/25	JDS	CAS	Draft letter objection to Examiner's Budget.	.90	270.00
4/17/25	JDS	CAS	Draft status letter to Court for adversary complaints in lieu of appearance.	1.00	300.00
4/17/25	JDS	CAS	Revise certification and brief to Opposition and Certificaion to Prestige Motion, and Cross Motion thereto.	1.00	300.00
4/17/25	JHR	CLAIM	Drafted suponeas to be served on 1) Jerry Hostetter 2) Buck Joffrey 3) Dave Zook 4) William Poole	.60	336.00
4/17/25	JHR	CLAIM	Contineud to draft Motion and Certificaion in support of Motion to Expunge Claims of Prestige.	.90	504.00
4/17/25	SBP	CLAIM	Review Univest Bank claim	.10	52.50
4/17/25	SBP	CAS	Revise motion to quash subpoena by Prestige	.50	262.50
4/17/25	SBP	BOPS	Call with H. Sorvino re: HCH and HIH	.20	105.00



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Date	Atty	Task	Description	Hours	Amount
4/17/25	SBP	AVOID	Call with M. Weiss re: status of Orrstown settlement	.20	105.00
4/17/25	SBP	CLAIM	Review Orrstown claims	.20	105.00
4/17/25	SBP	BOPS	Review UCCs for Heller Capital Group	.20	105.00
4/17/25	SBP	CAS	Call with client and A. Sodono re: case status	.90	472.50
4/17/25	SBP	CAS	Revise opposition and cross motion to Prestige stay relief motion	.90	472.50
4/17/25	SBP	CAS	Call with H. Sorvino and A. Sodono re: status	.40	210.00
4/18/25	AS1	CAS	Analyze and review multiple emails and financials with Sari B. Placona and H. Sorvino re: settlement with Deerfield	.90	652.50
4/18/25	AS1	CAS	Communicate with L. Gibbons re: settlement with Heller	.20	145.00
4/18/25	AS1	DATA	Analyze "workbook" and discuss with Sari B. Placona	.70	507.50
4/18/25	AS1	CAS	Review GCI debt, restructuring, sub note, concessions, MSO debt summary, Needham bank loan choice issues	.70	507.50
4/18/25	AS1	CAS	Call from L. Gibbons re: Orrstown settlement with spouse	.20	145.00
4/18/25	JDS	CAS	Draft status letters to the court on pending adversary matters.	.40	120.00
4/18/25	JDS	CAS	Review state court dockets, filed, correspondences draft status ltr.	1.30	390.00
4/18/25	JDS	CAS	Revise status letters to the court on pending adversary matters.	.50	150.00
4/18/25	SBP	AVOID	Call with A. Ciardi, H. Sorvino, and A. Sodono re: Deerfield settlement	.60	315.00
4/18/25	SBP	BOPS	Review HH workbook	.20	105.00
4/18/25	SBP	CLAIM	Review R. Haller claim	.10	52.50
4/18/25	SBP	BOPS	Review loan agreements	.60	315.00
4/18/25	SBP	CAS	Call with H. Sorvino and client re: status	.40	210.00
4/20/25	SBP	CAS	Email M. Weiss re: status of transfer motion	.10	52.50
4/20/25	SBP	CLAIM	Review Needham Bank claim	.10	52.50
4/20/25	SBP	LIT	Revise status letter for Reliance litigation	.20	105.00
4/20/25	SBP	LIT	Revise status letter for Austin Business litigation	.20	105.00
4/20/25	SBP	STAY	Revsie letter to Wilmington re: stay violation	.10	52.50
4/20/25	SBP	CAS	Revise subpoenas to Prestige Funds and officers	.20	105.00
4/20/25	SBP	BOPS	Review business financials for Deerfield meeting	.20	105.00
4/21/25	AD	CAS	Review docket re: upcoming hearings on stay relief.	.20	112.00
4/21/25	AS1	STAY	Analyze motion, crtification, brief, and order re: Prestige	2.10	1,522.50
4/21/25	AS1	CAS	Revise opposition to Examiner's budget and discuss with Sari B. Placona	.30	217.50
4/21/25	AS1	CAS	Analyze motion, brief, certification, and order to quash subpoena	1.60	1,160.00
4/21/25	AS1	CAS	Communicate with with Sari B. Placona re: motion to quash	.20	145.00
4/21/25	AS1	DATA	Analyze forbearance agreement and discuss with Leo	.40	290.00



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Date	Atty	Task	Description	Hours	Amount
4/21/25	AS1	CAS	Call with L. Gibbons re: Orrstown settlement with spouse	.20	145.00
4/21/25	JDS	STAY	Review certification to Opp. to Prestige Stay Motion, compile documents for exhibit A and create exhibit.	.20	60.00
4/21/25	JDS	CAS	Revise brief to Opposition to Prestige Motion and Debtor's Cross Motion.	.40	120.00
4/21/25	JDS	CAS	Review finalized Opp. to Prestige Motion and Debtor's cross motion based on final edit, send to S. Lipstein for filing.	.20	60.00
4/21/25	JDS	CAS	Send follow up email to counsel in Heller v. Austin Business Finance, LLC, bearing Adv. Pro. No. 25-01118 (JNP) to determine if counsel approves of status letter to be filed in lieu of appearance tomorrow 4/22/25.	.20	60.00
4/21/25	JDS	CAS	Revise Cross Motion to Prestige's Motion to expound on relation of Cross Motion to Motion.	.70	210.00
4/21/25	JDS	CAS	Send email to Stark & Stark regarding approval of status letter for Daryl Fred Heller v. Reliance Platinum d/b/a Reliance Financial.	.30	90.00
4/21/25	JHR	CLAIM	Reviewed status of various subpoenas.	.10	56.00
4/21/25	JHR	CLAIM	Reviewed status of claims motion	.10	56.00
4/21/25	MMD	DISP	Review return of overpayment by Fulton Bank	.10	56.00
4/21/25	SBP	CLAIM	Review Truist claim	.10	52.50
4/21/25	SBP	CAS	Review subpoena to Truist Bank	.20	105.00
4/21/25	SBP	CAS	Review examiner subpoenas	.20	105.00
4/21/25	SBP	LIT	Review forbearance agreement with Orrstown	.20	105.00
4/21/25	SBP	STAY	Review Orrstown motion for stay relief	.30	157.50
4/21/25	SBP	STAY	Revise opposition to Prestige motion for stay relief	.60	315.00
4/21/25	SBP	CAS	Revise letter objecting to examiner budget	.10	52.50
4/21/25	SBP	BOPS	Revise motion to quash Prestige subpoena	.70	367.50
4/21/25	SBP	BOPS	Call with client re: status of Prestige subpoena	.20	105.00
4/21/25	SBP	FEEAP	Email with client re: criminal counsel retention	.10	52.50
4/21/25	SBP	AVOID	Email with M. Weis re: settlement	.10	52.50
4/21/25	SBP	BOPS	Call with A. Ciardi re: examiner	.20	105.00
4/21/25	SBP	CLAIM	Review claims filed	.20	105.00
4/21/25	SBP	AVOID	Communicate with L. Gibbons re: Orrstown agreement	.20	105.00
4/21/25	SBP	BOPS	Call with H. Sorvino and client re: status of HCG and HIH	.30	157.50
4/21/25	SBP	AVOID	Call with A. Ciardi and H. Sorvino re: Deerfield settlement	.90	472.50
4/22/25	AS1	CAS	Communicate with Sari B. Placona, Daryl Heller, and H. Sorvino re: Deerfield settlement documents	.30	217.50
4/22/25	AS1	CAS	Call with Sari B. Placona, Daryl Heller, and L. Gibbons re: settlement	.50	362.50
4/22/25	AS1	CAS	Call with A. Ciardi re: examiner	.20	145.00
4/22/25	AS1	CAS	Review HCG assets rec. document	.20	145.00



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Date	Atty	Task	Description	Hours	Amount
4/22/25	JDS	CAS	Review email and send opposition to Prestige Stay Relief Motion and Debtor's cross motion to S. Placona.	.10	30.00
4/22/25	JDS	CAS	Create exhibits for Motion to Quash Prestige Subpoena.	.40	120.00
4/22/25	SBP	CAS	Call with client and A. Sodono re: status of Deerfield settlement	1.20	630.00
4/22/25	SBP	CAS	Call with A. Ciardi and A. Sodono re: status of examiner	.20	105.00
4/22/25	SBP	CLAIM	Review filed claims	.20	105.00
4/22/25	SBP	BOPS	Review debtor financials of businesses for Deerfield	.60	315.00
4/22/25	SBP	STAY	Call with counsel re: Wilmington Bank claim and stay violation	.20	105.00
4/22/25	SBP	BOPS	Revise opposition and cross motion to Prestige stay relief	.40	210.00
4/22/25	SBP	FEEAP	Revise order authorizing C. Adams as criminal counsel	.10	52.50
4/22/25	SBP	CAS	Call with L. Gibbons re: status of agreement with Orrstown	.20	105.00
4/22/25	SBP	CAS	Call with M. Weis re: transfer motion	.20	105.00
4/23/25	AS1	DISP	Call with Sari B. Placona and Daryl Heller re: Sea isle funds and settlement	.30	217.50
4/23/25	AS1	DATA	Analyze UCCs Doobie, DB DDS, GCC Inv. Hold	.60	435.00
4/23/25	JDS	CAS	Research caselaw on legal title to marital property.	.60	180.00
4/23/25	JDS	CAS	Draft Rule 9019 Motion to approve Agreement between Debtor, Charlene Heller and Orrstown Bank.	2.40	720.00
4/23/25	SBP	CAS	Email with A. Ciardi re: subpoenas	.10	52.50
4/23/25	SBP	DISP	Call with client re: beach sale proceeds	.20	105.00
4/23/25	SBP	FEEAP	Revise certification of no objections to monthly fee statements	.20	105.00
4/23/25	SBP	BOPS	Review business financials	.60	315.00
4/23/25	SBP	CAS	Call with client and A; Sodono re: Deerfield status	.50	262.50
4/23/25	SBP	CAS	Call with H. Sorvino and client re: Deerfield settlement	.30	157.50
4/24/25	AS1	CAS	Review examiner objection to McCarter and discuss with Sari B. Placona client	.50	362.50
4/24/25	AS1	LIT	Review sublease litigation	.20	145.00
4/24/25	JDS	CAS	Revise rule 9019 motion pleadings.	.60	180.00
4/24/25	JDS	CAS	Revise 9019 motion to approve settlement.	.50	150.00
4/24/25	JDS	CAS	Draft 9019 Motion to approve settlement.	1.30	390.00
4/24/25	SBP	AVOID	Call with client, H. Sorvino, and A. Ciardi re: Deerfield litigation	.50	262.50
4/24/25	SBP	AVOID	Call with client and H. Sorvino re: follow up on Deerfield litigation	.70	367.50
4/24/25	SBP	FEEAP	Review UST objection to criminal counsel retention application	.20	105.00
4/24/25	SBP	AVOID	Review email from A. Ciardi re: Motion for Summary Judgment	.10	52.50
4/24/25	SBP	AVOID	Review terms of settlement from A. Ciardi	.10	52.50
4/24/25	SBP	AVOID	Revise motion for 9019 approval of Orrstown settlement	.20	105.00
4/24/25	SBP	BOPS	Call with H. Sorvino and client re: status	.50	262.50
4/24/25	SBP	AVOID	Call with H. Sorvino and A. Ciardi re: term sheet	.50	262.50



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Date	Atty	Task	Description	Hours	Amount
4/25/25	JDS	CAS	Review file and docket and draft status letter for third adversary proceeding in lieu of appearance.	1.00	300.00
4/25/25	SBP	AVOID	Email L. Gibbons and H. Sorvino re: status of Deerfield adversary	.10	52.50
4/25/25	SBP	FEEAP	Email K. Gwyne re: retention application objection	.10	52.50
4/25/25	SBP	AVOID	Call with H. Sorvino and client re: Deerfield status	.70	367.50
4/25/25	SBP	AVOID	Revise 9019 motion to approve settlement	.20	105.00
4/25/25	SBP	BOPS	Call with H. Sorvino and J. Vandermark re: status of liens	.30	157.50
4/25/25	SBP	LIT	Revise letter to court re: Prestige adversary	.10	52.50
4/27/25	JDS	CAS	Revise status letter for third adversary proceeding in lieu of appearance.	.90	270.00
4/27/25	JDS	CAS	Revise 9019 motion on martial property issue under Pennsylvania State Law, research and add caselaw and statutory law to pleadings.	1.80	540.00
4/27/25	SBP	AVOID	Call with client and H. Sorvino re: Deerfield	.80	420.00
4/27/25	SBP	AVOID	Review revised term sheet with Deerfield	.20	105.00
4/27/25	SBP	CAS	Email with M. Weis re: status of hearings	.10	52.50
4/27/25	SBP	AVOID	Review marital property research for 9019 motion with Orrstown	.20	105.00
4/27/25	SBP	FEEAP	Revise application to pay MSB from sale proceeds	.20	105.00
4/27/25	SBP	CAS	Review and revise stipulation to vacate Wilmington Savings Fund judgment	.10	52.50
4/28/25	AD	LIT	Review source documents from Penna State Court proceedings.	1.70	952.00
4/28/25	AD	LIT	Prepare timeline.	.50	280.00
4/28/25	AD	LIT	Legal research re: "Participation" tort imposing personal liability for contempt and entitlement to punitive sanctions rather than compensatory.	1.60	896.00
4/28/25	JDS	CAS	Review file determine ownership of Paramount Funding Group, review letter from Penn. Dept. Rev., drafted letter to same regarding violation of automatic stay.	1.30	390.00
4/28/25	JDS	CAS	Revise 9019 memorandum of law.	.50	150.00
4/28/25	SBP	CAS	Communicate with J. Gold re: subpoena	.10	52.50
4/28/25	SBP	BOPS	Call with client, H. Sorvino, and L. Gibbons re: case status	1.00	525.00
4/28/25	SBP	BOPS	Email with C. Mazza re: Gallimore motion	.10	52.50
4/28/25	SBP	CAS	Call with M. Kizner re: Prestige hearing on stay relief	.10	52.50
4/28/25	SBP	CAS	Attend court hearing on Reed Smith application	.70	367.50
4/28/25	SBP	LIT	Revise status letter on Prestige adversary proceeding	.10	52.50
4/28/25	SBP	AVOID	Call with L. Gibbons re: 9019 motion with Orrstown	.20	105.00
4/28/25	SBP	BOPS	Revise letter to Pennsylvania Department of State re: stay violation	.10	52.50



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Date	Atty	Task	Description	Hours	Amount
4/28/25	SBP	BOPS	Review letter from Prestige to investors	.10	52.50
4/28/25	SBP	AVOID	Call with A. Ciardi re: status of settlement	.20	105.00
4/28/25	SBP	AVOID	Call with H. Sorvino and client re: Deerfield settlement	.40	210.00
4/28/25	SBP	FEEAP	Discuss Reed Smith employment application with client	.10	52.50
4/28/25	SBP	AVOID	Revise 9019 motion with Orrstown	.40	210.00
4/29/25	AS1	LIT	Attend hearing on Prestige motions	1.30	942.50
4/29/25	AS1	CAS	Prepare for hearing on Prestige motions and analyze motions and exhibits and prepare notes for court	.90	652.50
4/29/25	SBP	BOPS	Call with client and A. Sodono re: Prestige stay relief	.30	157.50
4/29/25	SBP	BOPS	Attend court hearing on Prestige motion that no stay is in place	1.30	682.50
4/29/25	SBP	BOPS	Prepare for oral argument on Prestige stay relief motion	.40	210.00
4/29/25	SBP	AVOID	Revise 9019 motion with Orrstown	.40	210.00
4/29/25	SBP	BOPS	Call with client re: Prestige motion for stay relief	.30	157.50
4/29/25	SBP	AVOID	Call with L. Gibbons and M. Weis re: settlement with Orrstown	.20	105.00
4/30/25	SBP	CAS	Call with H. Sorvino re: status	.20	105.00

TOTAL PROFESSIONAL SERVICES

\$ 92,998.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
ISABELLA FISHER	6.10	250.00	1,525.00
ANDREA DOBIN	6.40	560.00	3,584.00
ANTHONY SODONO, III	44.00	725.00	31,900.00
JOSHUA H. RAYMOND	5.60	560.00	3,136.00
MICHELE M. DUDAS	6.50	560.00	3,640.00
JOHN STERN	32.90	300.00	9,870.00
JOSEPH ZAPATA	.20	375.00	75.00
SARI PLACONA	72.10	525.00	37,852.50
MATTHEW R KELLY	.40	190.00	76.00
SCOTT D. PLATTON	4.70	285.00	1,339.50
Total	178.90		\$ 92,998.00



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DISBURSEMENTS

Description	Amount
Filing Fee	34.00
PACER	183.80
Overnight Express Mail	53.94
Travel/Parking Expenses	499.94
Postage	769.76
Westlaw	40.51
Inside Duplicating	17.80

TOTAL DISBURSEMENTS \$ 1,599.75

TOTAL THIS INVOICE \$ 94,597.75



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June 12, 2025

Daryl Heller

Invoice #: 242915
Client #: 35240
Matter #: 1
Billing Attorney: SBP

INVOICE SUMMARY

For Professional Services Rendered Through May 31, 2025.

RE: Deerfield Capital, LLC - Bankruptcy Chapter 11

Total Professional Services	\$ 68,439.00
Total Disbursements	<u>\$ 497.52</u>
TOTAL THIS INVOICE	\$ 68,936.52

McManimon Scotland & Baumann, LLC

Invoice #: 242915

June 12, 2025

PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
5/01/25	SBP	Call with A Ciardi and H Sorvino re settlement terms	.30	157.50
5/01/25	SBP	Call with client and H Sorvino re Deerfield term sheet	.30	157.50
5/01/25	SBP	Review term sheet with Deerfield	.20	105.00
5/01/25	SBP	Call with H Sorvino and client re status of case	.30	157.50
5/01/25	SBP	Call with A Ciardi and H Sorvino re settlement	.30	157.50
5/01/25	SBP	Call with client and H Sorvino re Deerfield settlement	.30	157.50
5/02/25	SBP	Email with M Weiss re adjournment of transfer motion	.10	52.50
5/02/25	SBP	Review email from client re term sheet with Deerfield	.20	105.00
5/04/25	SBP	Call with client and H Sorvino re Deerfield term sheet	2.10	1,102.50
5/04/25	SBP	Review Deerfield term sheet	.20	105.00
5/05/25	SBP	Review withdrawal of claim of R Haller	.10	52.50
5/05/25	SBP	Call with H Sorvino and client re Deerfield term sheet	.90	472.50
5/05/25	SBP	Call with H Sorvino and client re Deerfield term sheet	.70	367.50
5/05/25	SBP	Revise letter to court in reply to Orrstown objection to fees	.20	105.00
5/05/25	SBP	Call with H Sorvino re term sheet with Deerfield Capital	.20	105.00
5/06/25	AD	Review Court decision as to pursuing appeal; conference with S Platten re same.	.40	224.00
5/06/25	SBP	Call with H Sorvino and client re Deerfield term sheet	1.10	577.50
5/06/25	SBP	Call with A Ciardi and and H Sorvino re term sheet	.40	210.00
5/06/25	SBP	Call with H Sorvino and client re Deerfield term sheet	.60	315.00
5/06/25	SBP	Call with A Ciardi and H Sorvino re Deerfield term sheet	.20	105.00
5/06/25	SBP	Review revised term sheets from Deerfield Capital	.40	210.00
5/06/25	SBP	Call with H Sorvino and client re term sheet	.40	210.00
5/06/25	SBP	Call with H Sorvino and client re Deerfield term sheet	.30	157.50
5/06/25	SBP	Call with client and H Sorvino re Deerfield term sheet	.20	105.00
5/06/25	SBP	Review Leaman objection to fee order	.20	105.00
5/06/25	SBP	Call with M Weis re status of SJ motion	.20	105.00
5/06/25	SBP	Call with A Ciardi and H Sorvino re Deerfield term sheet	.30	157.50
5/07/25	SBP	Call with M Weis re fee order	.20	105.00
5/07/25	SBP	Review Orrstown amended claim	.10	52.50
5/07/25	SBP	Review Truist Bank garnishment letter	.20	105.00
5/07/25	SBP	Email with client re Deerfield term sheet	.10	52.50
5/07/25	SBP	Draft 9019 motion with Deerfield	1.60	840.00
5/07/25	SBP	Revise order approving fees	.10	52.50

McManimon Scotland & Baumann, LLC

Invoice #: 242915

June 12, 2025

Date	Atty	Description	Hours	Amount
5/07/25	SBP	Revise application and order shortening time for 9019 motion with Deersfield	.20	105.00
5/08/25	AD	Research "impossibility" defense to contempt and impact of asserting 5th amendment.	1.80	1,008.00
5/08/25	AD	Conference with S Platton re approach to appeal.	.20	112.00
5/08/25	AD	Analyze Appellate issues.	1.00	560.00
5/08/25	AD	Outline documents to be requested and strategize approach to appeal.	1.10	616.00
5/08/25	SBP	Review notice of intent to serve subpoena on Paramount	.10	52.50
5/08/25	SBP	Email with client re status items	.10	52.50
5/08/25	SBP	Call with K Schiffman and Jim re Silverview Credit re nondischargeability	.20	105.00
5/08/25	SBP	Email with client re Silverview Credit allegations	.10	52.50
5/08/25	SBP	Call with H Sorvino re status	.20	105.00
5/08/25	SBP	Review subpoena to RAW Ventures from Prestige	.20	105.00
5/08/25	SBP	Call with client re status of case	.70	367.50
5/09/25	AS1	Analyze letter re Pennsylvania Dept. Tax and assessment	.30	217.50
5/09/25	JDS	Review U.S. Trustee's Objection to Retention of Professional.	1.00	300.00
5/09/25	SBP	Review client remails re Getter emails	.10	52.50
5/09/25	SBP	Revise third monthly fee statement	.20	105.00
5/09/25	SBP	Call with H Sorvino and C Adams re status	1.10	577.50
5/09/25	SDP	Research re PA sanctions issue for appeal.	1.50	427.50
5/11/25	JDS	Draft reply to UST objection to retention of professional.	2.00	600.00
5/11/25	JDS	Revise reply to UST objection to retention of professional.	1.10	330.00
5/12/25	AS1	Communicate with Heidi Sorvino re petition and schedules and discuss corporate filings	.50	362.50
5/12/25	JDS	Revise email-memorandum on issues of whether fee application is required when paid by non-estate assets, and whether a fee application can be redacted.	.40	120.00
5/12/25	JDS	Review application and order shortening time for 9019 motion.	.30	90.00
5/12/25	JDS	Research and draft email-memorandum on issues of whether fee application is required when paid by non-estate assets, and whether a fee application can be redacted.	.30	90.00
5/12/25	JDS	Review 9019 motion to input relevant information when drafting Notice of Settlement.	.60	180.00
5/12/25	JDS	Continue drafting email-memorandum on issues of whether fee application is required when paid by non-estate assets, and whether a fee application can be redacted.	.50	150.00

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Invoice #: 242915

June 12, 2025

Date	Atty	Description	Hours	Amount
5/12/25	JDS	Revise Reply to U.S. Trustee's Objection to Retention of Criminal Counsel, add section regarding fee applications and also regarding attorney client privilege of fee applications.	.80	240.00
5/12/25	SBP	Email with G Kramer re 9019 motion	.10	52.50
5/12/25	SBP	Review email from J Hostetter re calling Prestige meeting	.10	52.50
5/12/25	SBP	Review examiner subpoena to Gemini Trust	.10	52.50
5/12/25	SBP	Review Prestige letter to Deerfield with subpoena	.10	52.50
5/12/25	SBP	Review research on insurance renewal	.20	105.00
5/12/25	SBP	Review and revise 9019 motion to approve settlement	.30	157.50
5/12/25	SBP	Review Al Ciardi email to examiner re stand down	.10	52.50
5/12/25	SBP	Review H Freese withdrawal as counsel	.10	52.50
5/12/25	SBP	Review draft complaint to not discharge debt by Silverview	.30	157.50
5/12/25	SBP	Review and revise reply to UST objection to criminal counsel retention	.20	105.00
5/12/25	SBP	Review settlement agreement with Deerfield Capital	.50	262.50
5/12/25	SBP	Call with client and H Sorvino re status	.30	157.50
5/12/25	SBP	Call with A Ciardi re status	.20	105.00
5/13/25	AS1	Communicate with client re settlement terms and conditions of sale and amendments	.50	362.50
5/13/25	AS1	Call with Daryl Heller re settlement issues	.50	362.50
5/13/25	AS1	Call with Sari B. Placona and A. Ciardi re settlement	.20	145.00
5/13/25	AS1	Call with Daryl Heller and Sari B. Placona re settlement terms and conditions and agreement	.60	435.00
5/13/25	AS1	Communicate with L. Gibbons re spouse property	.40	290.00
5/13/25	AS1	Research case law re spouse property	.70	507.50
5/13/25	JDS	Review Rule 9019 Motion and redline in relevant information provided by Client and Deerfield's counsel.	1.30	390.00
5/13/25	JDS	Research and write email memorandum on issue of whether subpoena to non-debtor business of the debtor is subject to the automatic stay.	.60	180.00
5/13/25	SBP	Call with client re status of Deerfield term sheet	.10	52.50
5/13/25	SBP	Call with client re settlement with Deerfield	.40	210.00
5/13/25	SBP	Call with A Sodono and A Ciardi re 9019 motion	.20	105.00
5/13/25	SBP	Call with C Adams re reply to UST objection to retention	.20	105.00
5/13/25	SBP	Call with client re valuations of companies	.10	52.50
5/13/25	SBP	Review email from client on Chicago Atlantic position on settlement	.10	52.50
5/13/25	SBP	Call with M Fencer re California litigation against entities	.20	105.00
5/13/25	SBP	Review client comments to Deerfield settlement agreement	.30	157.50

McManimon Scotland & Baumann, LLC

Invoice #: 242915

June 12, 2025

Date	Atty	Description	Hours	Amount
5/13/25	SBP	Zoom call with Haynes Boone (counsel for Chicago Atlantic) re sale proceeds	.20	105.00
5/14/25	AS1	Work on motion, brief, order, and certification re settlement	4.80	3,480.00
5/14/25	JDS	Revise Rule 9019 Motion.	.50	150.00
5/14/25	JHR	Reviewed various subpoenas and email from D Heller re proposed revisions and questions regarding same.	.50	280.00
5/14/25	SBP	Call with client re Silverview draft complaint	.10	52.50
5/14/25	SBP	Email with G Kramer re settlement status	.10	52.50
5/14/25	SBP	Call with client re settlement agreement	.20	105.00
5/14/25	SBP	Call with K Schiffman and J Vincequerra re Silverview draft complaint	.20	105.00
5/14/25	SBP	Call with client re M Weis letter to Judge Brown stay relief for Charlene	.20	105.00
5/14/25	SBP	Communicate with D Heller re Silverview complaint	.30	157.50
5/14/25	SBP	Review client comments to draft complaint by Silverview to object to discharge	.30	157.50
5/14/25	SBP	Review and revise 9019 motion with Deerfield	.60	315.00
5/14/25	SBP	Review Deerfield revise settlement agreement	.30	157.50
5/14/25	SBP	Call with N Ricci re MORS	.10	52.50
5/14/25	SBP	Call with H Sorvino re settlement agreement	.20	105.00
5/14/25	SBP	Discuss subpoenas to Prestige with J Raymond	.10	52.50
5/15/25	AS1	Review/revise motion, brief, order, and certification re settlement	2.20	1,595.00
5/15/25	AS1	Call with Sari B. Placona and Heidi Sorvino re status	.30	217.50
5/15/25	JDS	Phonecall with client to discuss Settlement Agreement in order to edit Rule 9019 Motion.	.50	150.00
5/15/25	JDS	Revise 9019 motion based on revised certification in support.	.40	120.00
5/15/25	JDS	Review revisions to cert. and brief for 9019 Motion.	.60	180.00
5/15/25	JDS	Review email Prestige Complaint and send email noting Answer due date.	.20	60.00
5/15/25	JDS	Review and revise Settlement Agreement with Deerfield.	.60	180.00
5/15/25	JDS	Edit certification to Rule 9019 Motion based on notes from phone call with client.	.80	240.00
5/15/25	JHR	Correspondences from and to D Heller re revisions to subpoenas and revised and supplemented subpoenas.	1.70	952.00
5/15/25	JHR	Call with D Heller to discuss and review and revise various Subpoenas.	.60	336.00
5/15/25	SBP	Email with M Weis re Deerfield status settlement	.10	52.50
5/15/25	SBP	Email with J Sponder re Truist account	.10	52.50
5/15/25	SBP	Revise 9019 motion with Deerfield	.60	315.00
5/15/25	SBP	Reiew letter from Stark & Stark to examiner with subpoena	.20	105.00

McManimon Scotland & Baumann, LLC

Invoice #: 242915

June 12, 2025

Date	Atty	Description	Hours	Amount
5/15/25	SBP	Review subpoena from Prestige to Deerfield	.10	52.50
5/15/25	SBP	Revise certification of Debtor in support of Deerfield settlement	.60	315.00
5/15/25	SBP	Review Prestige subpoenas to Block, Paypal, Amex, Apple, and Truist	.30	157.50
5/15/25	SBP	Call with H Sorvino re Deerfield settlement	.20	105.00
5/15/25	SBP	Email K Gwynee re stand down	.10	52.50
5/15/25	SBP	Review Prestige Fund complaint for nondischargeability	.20	105.00
5/15/25	SBP	Call with client and H Sorvino re status	.30	157.50
5/15/25	SBP	Call with client and H Sorvino re settlement agreement	1.40	735.00
5/15/25	SDP	Research for appellate action.	1.50	427.50
5/16/25	AS1	Teams call re Alfons sales	.30	217.50
5/16/25	AS1	Communicate with Daryl Heller, Sari B. Placona and Heidi Sorvino re strategy and status	.40	290.00
5/16/25	JDS	Send email to client regarding adversary complaint.	.10	30.00
5/16/25	JHR	Revise edit and supplement Subpoenas	.80	448.00
5/16/25	JHR	Reviewed various emails regarding the service of subpoenas and whether counsel for Prestige will accept service.	.10	56.00
5/16/25	SBP	Review client comments to subpoenas to Prestige Funds	.30	157.50
5/16/25	SBP	Call with client re Prestige subpoena	.40	210.00
5/17/25	AS1	Call with Daryl Heller re strategy	.30	217.50
5/18/25	JHR	Continued to review, revise and edit Subpoenas	.60	336.00
5/19/25	AS1	Call with Dary Heller and Sari B. Placona re status	.50	362.50
5/19/25	AS1	Analyze motion expenses certification and order	1.90	1,377.50
5/19/25	JDS	Review 3 Complaints as to dischargeability of debts.	.20	60.00
5/19/25	JDS	Revise 9019 motion certification based on Client's comments.	1.20	360.00
5/19/25	JDS	Draft and send email to client noting what to review for certification in support of 9019 Motion to approve Settlement.	.20	60.00
5/19/25	JDS	Revise brief and cert. for Motion to Expunge Prestige claims.	1.10	330.00
5/19/25	JDS	Revise 9019 Motion certification for Agreement with Deerfield.	.50	150.00
5/19/25	JHR	Revised subpoena.	.50	280.00
5/19/25	JHR	Correspond with Debtor re: subpoenas.	.50	280.00
5/19/25	JHR	Correspond with parties seizing subpoenas.	.90	504.00
5/19/25	SBP	Call with client and A Sodono re strategy	.40	210.00
5/19/25	SBP	Review motion to extend time to file complaint by K J Doughty	.20	105.00
5/19/25	SBP	Discuss 9019 certification with C Adams	.10	52.50
5/19/25	SBP	Zoom team call re sale of property with Q Miller, D Heller, L Young, and A Sodono	.40	210.00
5/19/25	SBP	Review appraisal summary for six lots for land swap with Q Miller	.30	157.50

McManimon Scotland & Baumann, LLC

Invoice #: 242915

June 12, 2025

Date	Atty	Description	Hours	Amount
5/19/25	SBP	Call with A Sodono, and client, and H Sorvino re status of case and examiner motion	1.10	577.50
5/19/25	SBP	Email with N Isaacson re Paramount status	.10	52.50
5/19/25	SBP	Call with H Sorvino re status	.20	105.00
5/19/25	SBP	Review non dischargeability complaints filed by Silverview, Prestige, D Zook, Pinnacle Asset, Summit Asset, Deerfield, Hostetter, and D Poole	1.20	630.00
5/19/25	SBP	Review subpoenas to Prestige Fund managers	.10	52.50
5/19/25	SBP	Email with M Weis re status of matters	.10	52.50
5/19/25	SBP	Review and revise motion to expunge Prestige claims	.30	157.50
5/19/25	SBP	Review and revise motion to have examiner stand down	.30	157.50
5/19/25	SBP	Review discharge complaints filed by Funders App, Karen Parreira, and Reliance Financial	1.20	630.00
5/19/25	SBP	Call with A Ciardi re status of settlement	.20	105.00
5/20/25	AS1	Review, analyze, and amend certification in support of expungement Prestige	1.40	1,015.00
5/20/25	CA	Creating chart with complaints filed nondischarability actions	.40	100.00
5/20/25	JDS	Phone call with Client to discuss Rule 9019 Motion certification.	.30	90.00
5/20/25	JDS	Revise certification for Motion to quash Prestige's Claims.	1.00	300.00
5/20/25	JDS	Revise Rule 9019 Motion certification and memorandum of law pursuant to Client's input.	1.10	330.00
5/20/25	JDS	Revise legal brief, notice of motion and proposed order for Motion to Expunge Prestige Claim based on revised certification from client.	.90	270.00
5/20/25	JDS	Review claims and create chart of claims, compile documents and create exhibits.	.90	270.00
5/20/25	JDS	Revise 9019 Motion certification based on Client's input.	.40	120.00
5/20/25	JDS	Clarify issue with Exhibit to Certification in Support of 9019 Motion then create exhibit.	.30	90.00
5/20/25	JDS	Revise Motion to Expunge Prestige Claim pleadings pursuant to Clinet's comments.	2.30	690.00
5/20/25	SBP	Revise order approving McCarter retention application with Orrstown comments	.10	52.50
5/20/25	SBP	Call with client re Prestige motion for stay relief	.40	210.00
5/20/25	SBP	Review subpoena to Charles Schwab, Orrstown, PNC, and Waterfall	.20	105.00
5/20/25	SBP	Prepare for hearing on McCarter retention application	.20	105.00
5/20/25	SBP	Attend court on retention application of McCarter & English	.10	52.50
5/20/25	SBP	Communicate with M Kizner re order re stay relief and cross motion for appeal	.10	52.50

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Date	Atty	Description	Hours	Amount
5/20/25	SBP	Listen to court decision on Prestige motion for stay relief and cross motion	.40	210.00
5/20/25	SBP	Call with K Gwyne re subpoena	.10	52.50
5/20/25	SBP	Revise certification in support of motion to expunge Prestige claims	.40	210.00
5/20/25	SBP	Call with H Sorvino and client re status	.30	157.50
5/20/25	SBP	Revise 9019 certification and memo in support of Deerfield settlement	.20	105.00
5/20/25	SBP	Review examiner status of subpoenas	.10	52.50
5/20/25	SBP	Call with client re Prestige claims	.60	315.00
5/21/25	AS1	Call with Leo Gibbons and Daryl Heller re sale Huron	.40	290.00
5/21/25	AS1	Communicate with Daryl Heller re Prestige claims and sale of real property	.30	217.50
5/21/25	AS1	Review and analyze R. 2004 Subpoena, R. 45 re Collier Kisner, and letter	.30	217.50
5/21/25	JDS	Compile Prestige claims and send to Client for review.	.20	60.00
5/21/25	JDS	Review Prestige Claims for Motion to Expunge.	.50	150.00
5/21/25	JDS	Research caselaw on Rule 2004 subpoenas in light of an adversary complaint, and when subpoenas need to comply with Fed. R. Civ. P. in order to send letter to counsel addressing issue.	.50	150.00
5/21/25	JDS	Draft letter to Pretige Funds' counsel regarding their Rule 2004 Subpoenas in light of there Adversary Complaint, advising of the law and to withdraw and serve subpoenas in compliance with Fed. R. Civ. P.	.70	210.00
5/21/25	JDS	Revise Motion to Expunge Prestige Claims.	1.30	390.00
5/21/25	JDS	Revise edits to motion to expunge pursuant to further edits to certification and memorandum of law.	.30	90.00
5/21/25	JHR	Correspondence from M Kizner and S Placona re deadline to respond to Subpoenas.	.20	112.00
5/21/25	SBP	Call with M Kizner and A Sodono re Prestige claims	.50	262.50
5/21/25	SBP	Call with H Sorvino and M Weis re Orrstown settlement	.30	157.50
5/21/25	SBP	Review revised redline orders from Prestige re stay relief	.10	52.50
5/21/25	SBP	Call with client re status	.30	157.50
5/21/25	SBP	Revise letter to M Kizner re subpoenas	.20	105.00
5/21/25	SBP	Review motion to appoint trustee filed by Prestige	.30	157.50
5/21/25	SBP	Call with client and A Sodono re property	.50	262.50
5/22/25	AS1	Call with D. Heller re settlement	.30	217.50
5/22/25	AS1	Review Luma subpoena	.20	145.00
5/22/25	JDS	Review First and Second Monthly Fee Statements of Examiner in order to draft limited objection to both.	.50	150.00
5/22/25	JDS	Further reduce notes on assets to discuss with Client.	.30	90.00

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Date	Atty	Description	Hours	Amount
5/22/25	JDS	Meeting with S. Placona and C. Ashnault to discuss non-dischargeability adversary complaints to strategize.	.30	90.00
5/22/25	JDS	Continue drafting limited objection to Examiner and Examiner Counsel fee applications. ECF 264 and 267.	.40	120.00
5/22/25	JDS	Review schedules and compile list of assets to prepare to discuss with Client regarding his Plan.	.50	150.00
5/22/25	JDS	Start to prepare/draft limited objection to Examiner's First and Second Monthly Fee Statements.	.30	90.00
5/22/25	JDS	Research caselaw in support of limited objection to Examiner and Examiner Counsel fee applications. ECF 264 and 267.	.40	120.00
5/22/25	JDS	Further revise limited objection to Examiner and Examiner Counsel fee applications. ECF 264 and 267.	.40	120.00
5/22/25	JDS	Finalize limited objection to Examiner and Examiner Counsel fee applications. ECF 264 and 267.	.30	90.00
5/22/25	JDS	Further revise Prestige Claims Expungement Motion pursuant to A. Sodono and Client's edits.	1.10	330.00
5/22/25	JDS	Further review and edit Motion to Expunge Prestige claims pleadings.	.50	150.00
5/22/25	JDS	Further revise Motion to Expunge Prestige claims pleadings.	.90	270.00
5/22/25	JHR	Reviewed deadline for document production and need to reschedule depositions.	.20	112.00
5/22/25	JHR	Reviewed deadline for document production and rescheduling deposition.	.10	56.00
5/22/25	SBP	Email client re order that Prestige is not stayed	.10	52.50
5/22/25	SBP	Review client email re strategy	.20	105.00
5/22/25	SBP	Call with H Sorvino re status	.20	105.00
5/22/25	SBP	Revise motion to expunge Prestige claims	.30	157.50
5/22/25	SBP	Review motion to suspend examiner	.20	105.00
5/22/25	SBP	Review emails from client	.20	105.00
5/22/25	SDP	Receipt of order permitting lifting of stay for purposes of appeal.	.20	57.00
5/23/25	AS1	Analyze Luma subpoena	.20	145.00
5/23/25	AS1	Communicate with Sari B. Placona re Luma subpoena	.10	72.50
5/23/25	AS1	Analyze motion to expunge and supporting documents	.40	290.00
5/23/25	AS1	Discuss motion to expunge with client	.20	145.00
5/23/25	AS1	Analyze strategy email	.10	72.50
5/23/25	AS1	Outline legal issues in connection with strategy email	.20	145.00
5/23/25	JDS	Retrieve and send Examiner Order to S. Placona for review for limited objection.	.10	30.00
5/23/25	JDS	Implement redlines to Motion to Expunge Prestige Claims.	.30	90.00

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Date	Atty	Description	Hours	Amount
5/23/25	JDS	Compile list of all assets, calculating value and equity interests and draft email to client with information to review in order to include in Plan.	.80	240.00
5/23/25	SBP	Email with C Adams re expungement certification	.10	52.50
5/23/25	SBP	Call with C Adams re case status	.30	157.50
5/23/25	SBP	Call with client, H Sorvino and A Sodono re status of case	1.20	630.00
5/25/25	SBP	Review Prestige motion for service for Paramount	.20	105.00
5/25/25	SBP	Review examiner order re filed motion for trustee	.10	52.50
5/26/25	SBP	Review Prestige notice to PA court re appeal	.10	52.50
5/27/25	JDS	Send follow up email to Client as to re-schdueling meeting and as to quesitons about assets and liabilities.	.10	30.00
5/27/25	JDS	Review and calendar apperance for Reliance Platinum, LLC, et al. v. Paramount CACE24011813.	.10	30.00
5/27/25	JDS	Draft opposition to Prestige Motion to Appoint Trustee.	.90	270.00
5/27/25	JDS	Further draft opposition and certificaion in opposition to Prestige Motion to Appoint Chpater 11 Trustee.	.70	210.00
5/27/25	JDS	Revise Opposition pleadings to Prestige Motion to Appoint Trustee.	.40	120.00
5/27/25	JDS	Conduct legal research for opposition to Prestige Motion to Appoint Chapter 11 Trustee.	1.00	300.00
5/27/25	JDS	Draft email with strategry as to answers to non-dischargeability of debt to C. Ashnault and provide him with a template to draft answers to same.	.20	60.00
5/27/25	JZ	Preparation for call with the client.	.10	37.50
5/27/25	JZ	Participation on call with D. Heller re: property swap by family owned entities.	.10	37.50
5/27/25	SBP	Call with A Ciardi re status and pre trial	.20	105.00
5/27/25	SBP	Email with client re MOR	.10	52.50
5/27/25	SBP	Communicate with M Weis re 9019 schedule	.10	52.50
5/28/25	AS1	Communicate with Adams re status	.20	145.00
5/28/25	AS1	Analyze multiple emails with client re strategy, claims, plan, interrogation, adversary proceeding, Pa. court proceeding, cross-motion	.80	580.00
5/28/25	AS1	Call with Daryl Heller, Sari B. Placona and Heidi Sorvino re strategy	1.10	797.50
5/28/25	JDS	Appearance at case management conference for Reliance Platinum d/b/a Reliance Financial v. Paramount Management Group, et al.	.50	150.00
5/28/25	JZ	Began reviewing documents in the case to begin preparing motion for a comfort order.	.70	262.50
5/28/25	SBP	Call with client, A Sodono, H Sorvino re status	.90	472.50
5/28/25	SBP	Review Wilmington Savings amended claim	.10	52.50

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Date	Atty	Description	Hours	Amount
5/28/25	SBP	Review emails re Prestige interrogatories	.10	52.50
5/28/25	SBP	Review Chicago Atlantic objection to Orrstown settlement	.20	105.00
5/28/25	SBP	Email M Weis re Orrstown additional settlement offer	.10	52.50
5/28/25	SBP	Review client responses to Prestige interrogatories	.20	105.00
5/29/25	AS1	Analyze memo, certification, and opposition to trustee motion	2.10	1,522.50
5/29/25	CA	Draft Motion to Quash Examiner Subpoena, NOM to Quash Examiner Subpoena.	.60	150.00
5/29/25	JDS	Draft application and order shortening time Prestige expungment motion.	.70	210.00
5/29/25	JDS	Compile relevant quesitons to changes to Prestige expungement motion and send email to S. Placona.	.20	60.00
5/29/25	JDS	Phone call with S. Placona to clarify edits to Prestige Expungment Motion.	.10	30.00
5/29/25	JDS	Draft email to client to provide copy of Asset Purchase Agreement to annex to Prestige Expungement Motion.	.10	30.00
5/29/25	JDS	Revise Prestige Expungement Motion, draft new certification in support, pursuant to Client's edits.	1.80	540.00
5/29/25	JDS	Review Prestige Expungement Motion for accuracy of exhibits and create exhibits for final version of motion.	.30	90.00
5/29/25	JDS	Revise Prestige Expungement Motion pursuant to Clients comments.	1.10	330.00
5/29/25	SBP	Call with H Sorvino re status of case	.30	157.50
5/29/25	SBP	Call with client, H Sorvino, and C Adams re Prestige certification to expunge claim	.60	315.00
5/29/25	SBP	Review revised motion to expunge Prestige claims	.10	52.50
5/29/25	SBP	Revise objection to examiner and counsel fees	.10	52.50
5/29/25	SBP	Review and revise opposition to motion to appoint trustee by Prestige.	.20	105.00
5/30/25	AS1	Zoom call with Sari B. Placona, Daryl Heller, and Heidi Sorvino re strategy, status, Prestige, Deerfield	.60	435.00
5/30/25	AS1	Review and revise motion to quash	1.40	1,015.00
5/30/25	CA	Researching criteria to quash sub., reading docs, legal argument	.50	125.00
5/30/25	CA	Draft NOM and Cert relating to Examiner Sub.	.40	100.00
5/30/25	CA	Revised Motion to Quash documents in relation to Examiner Sub.	.70	175.00
5/30/25	JDS	Send email to Client to coordinate meeting to discuss Plan.	.10	30.00
5/30/25	JDS	Update Prestige Expungment Motion Exhibits based on Client's final comments.	.10	30.00
5/30/25	JDS	Revise Heller - Limited Objection to Examiner, Financial Advisor & Counsel Fees.	.40	120.00
5/30/25	JDS	Review Deerfield Motion Suspend Examiner.	.30	90.00
5/30/25	JDS	Revise letter in support of Deerfield's Motion to Suspend Examiner.	.20	60.00

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5/30/25	JDS	Draft letter in support of Deerfield Motion.	.70	210.00
5/30/25	JDS	Revise Expungment Motion Prestige Claims pursuant Client's final comments.	.40	120.00
5/30/25	JDS	Compile Prestige Claims Expungement Motion, Exhibits and Application and Order Shortening Time, send to S. Lipstein for filing.	.20	60.00
5/30/25	JDS	Further revise letter in support of Deerfield's Motion to Suspend Examiner.	.70	210.00
5/30/25	JDS	Revise Heller letter in support of Deerfield's motion to suspend Examiner.	.40	120.00
5/30/25	JZ	Begin working on motion for a comfort order.	1.10	412.50
5/30/25	JZ	Drafted and sent email to D. Heller for information for the motion.	.10	37.50
5/30/25	SBP	Call with H Sorvino re Deerfield status	.20	105.00
5/30/25	SBP	Revise opposition to Prestige Fund motion to appoint trustee	.20	105.00
5/30/25	SBP	Zoom call with client, H Sorvino, and A Sodono re Prestige status	1.00	525.00
5/30/25	SBP	Review Form 426	.20	105.00
5/30/25	SBP	Revise limited objection to examiner monthly fee statement, financial advisors monthly fee statement, and counsel's monthly fee statement	.20	105.00
5/30/25	SBP	Review objection to Deerfield 9019 by Prestige Funds	.30	157.50
5/30/25	SBP	Revise letter in support of Deerfield motion to suspend examiner	.20	105.00
5/30/25	SBP	Call with client and H Sorvino re Prestige's opposition to 9019 motion	.40	210.00
5/30/25	SBP	Revise motion to quash Prestige subpoena to Examiner	.20	105.00
5/31/25	JDS	Review Objections by Chicago Atlantic and Prestige to various 9019 Motions and compile list of relevant questions to discuss with Client for phone call on 5/30/25.	1.00	300.00
5/31/25	JDS	Phone call with Client to discuss assets and projected income, Chicago Atlantic Objection, and Presrige Obection.	1.30	390.00
5/31/25	JDS	Review Heller Investment Holdings Operating Agreement to determine member ownership percentages.	.40	120.00
5/31/25	JDS	Draft Reply to Chicago Atlantic Objection to ECF 258.	2.40	720.00
5/31/25	JDS	Draft Reply to Prestige's Objection to 9019 Motion, incorporating Client's comments to Motion.	3.20	960.00

TOTAL PROFESSIONAL SERVICES

\$ 68,439.00

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SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
CONNOR, ASHNAULT	2.60	250.00	650.00
ANDREA DOBIN	4.50	560.00	2,520.00
ANTHONY SODONO, III	24.70	725.00	17,907.50
JOSHUA H. RAYMOND	6.70	560.00	3,752.00
JOHN STERN	53.60	300.00	16,080.00
JOSEPH ZAPATA	2.10	375.00	787.50
SARI PLACONA	49.20	525.00	25,830.00
SCOTT D. PLATTON	3.20	285.00	912.00
Total	146.60		\$ 68,439.00

DISBURSEMENTS

Description	Amount
Postage	220.22
Inside Duplicating	49.00
PACER	228.30

TOTAL DISBURSEMENTS \$ 497.52

TOTAL THIS INVOICE \$ 68,936.52